

EXHIBIT B

CHAPTER 7

HYDROLOGY

R645-301-700

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Chapter 7

R645-301-300

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CHAPTER 7

R645-301-700. HYDROLOGY

711. GENERAL REQUIREMENTS

711.100 – 711.500 Contents

This chapter provides a description of the hydrology and hydrogeology of the proposed Coal Hollow Mine permit and adjacent area. Specifically, this permit section includes descriptions of existing hydrologic resources according to R645-301-720, proposed operations and potential impacts to the hydrologic balance according to R645-301-730, methods and calculations utilized to achieve compliance with the hydrologic design criteria and plans according to R645-301-740, applicable hydrologic performance standards according to R645-301-750, and reclamation activities according to R645-301-760.

This information is presented in subsequent sections of this chapter and in Appendix 7-1. Appendix 7-1 includes a comprehensive characterization of groundwater and surface-water systems in the proposed Coal Hollow permit and adjacent areas, recommendations for groundwater and surface-water monitoring, and the results of a field investigation regarding the potential for alluvial valley floors in the proposed Coal Hollow Mine permit and adjacent area. It should be noted that Appendix 7-1 may be updated periodically in the future as additional hydrologic and hydrogeologic data become available.

712 CERTIFICATION

All cross sections, maps, and plans have been prepared per R645-301-512. Compliance with this section has been completed and certifications are available on all Drawings. The cross sections and maps that are included in this permit application and are required to be certified have been prepared by or under the direction of a qualified, registered, professional engineer or a professional geologist, with assistance from experts in related fields such as hydrology, geology and landscape architecture.

713 INSPECTION

Impoundments will be inspected as described under R645-301-514.300. Designs for proposed impoundments in the proposed Coal Hollow permit area are shown in Drawings 5-25 through 5-31 and Appendices A5-1 and A5-2. No impoundments or sedimentation

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ponds meeting the size or other qualifying criteria of MSHA, 30 CFR 77.216(a) exist or are planned within the proposed Mine Permit Area.

A professional engineer or specialist experienced in the construction of impoundments will inspect impoundments. Inspections will be made regularly during construction, upon completion of construction, and at least yearly until removal of the structure or release of the performance bond. The qualified registered professional engineer will promptly, after each inspection, provide to the Division, a certified report that the impoundment has been constructed and maintained as designed and in accordance with the approved plan and the R645 Rules. The report will include discussion of any appearances of instability, structural weakness or other hazardous conditions, depth and elevation of any impounded waters, existing storage capacity, any existing or required monitoring procedures and instrumentation and any other aspects of the structure affecting stability. A copy of the report will be retained at or near the mine site.

720 ENVIRONMENTAL DESCRIPTION

721 GENERAL REQUIREMENTS

The existing, pre-mining hydrologic resources within the permit and adjacent areas that may be affected by coal mining and reclamation operations are described in Appendix 7-1 and are summarized below.

Groundwater Resources

A spring and seep survey of the proposed Coal Hollow Mine permit and surrounding area has been conducted by Petersen Hydrologic, LLC (see sub-appendix B of Appendix 7-1). The locations of springs and seeps in the proposed permit and adjacent area are shown on Drawing 7-1. Seasonal discharge and field water quality measurements for springs and seeps in the proposed Coal Hollow Mine permit and adjacent area have been submitted electronically to the Utah Division of Oil, Gas and Mining Utah Coal Mining Water Quality Database (UDOGM, 2007). Baseline discharge and water quality data for groundwater resources in the proposed Coal Hollow Mine permit and adjacent area are have also been submitted electronically to the Utah Division of Oil, Gas and Mining, Utah Coal Mining Water Quality Database (UDOGM, 2007). Locations of baseline monitoring stations are shown on Drawing 7-2. Locations of water rights in and adjacent to the proposed Coal Hollow Mine permit area are shown on Drawing 7-3. Water rights data from the proposed Coal Hollow Mine permit and adjacent area are detailed in Appendix 7-3. A plot showing potentiometric levels in alluvial groundwater systems in the proposed Coal Hollow Mine permit and adjacent area is presented in Drawing 7-13.

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There are no domestic water supply springs or wells in the proposed mine disturbance area. However, springs that provide water for domestic and livestock use are located on and adjacent to the proposed permit area (See Drawing 7-2 and Appendix 7-3). Spring SP-23 (Spring House Spring) is located on the eastern boundary of the proposed Coal Hollow Mine permit area. Spring SP-23 is a groundwater seepage area with both discrete and diffuse flow with a total discharge that is usually about one gallon per minute or less. Historically, this seepage area was used as a domestic water source for the Pugh property (personal communication, Burton Pugh, 2008). However, water from SP-23, which is not developed, has not been used for this purpose for many years.

Spring SP-35 is located along the eastern boundary of the proposed Coal Hollow Mine permit area. Discharge from SP-35 averages less than 0.25 gallons per minute and is occasionally used for drinking water during camping trips or visits to the Pugh property (personal communication, Burton Pugh, 2008). However, there is apparently no associated domestic water right associated with this spring.

Two additional springs, which are located more distant from the proposed mining areas are also used for domestic water supply sources. These include SP-40, which is located at the Sorensen property, and SP-33, which is located at the Johnson property. Springs with stockwatering rights are listed in Appendix 7-3

Some lands east of and adjacent to the proposed Coal Hollow Mine permit area have historically been irrigated using water from alluvial springs. However, irrigation from these springs was apparently limited to home gardens and a few fruit trees. No irrigation of these lands (other than some yard watering at the Swapp Ranch house) is currently occurring nor has it occurred in at least the past 10 years (Personal communication, Burton Pugh, 2008; Richard Dames, 2007). Additionally, limited irrigation of lands occurs east of the proposed Coal Hollow permit area using surface waters derived from runoff from the adjacent Paunsaugunt Plateau area. Irrigation of these lands is largely limited to years with appreciable precipitation and stream runoff (Personal communication, Darlynn Sorensen, 2008).

Groundwater discharge occurs from springs and seeps in the upland areas of the Paunsaugunt Plateau east of the permit area (Tilton, 2001; Appendix 6-3). However, these springs discharge from rock strata that are topographically and stratigraphically up-gradient of and considerable distances from the proposed Coal Hollow Mine permit area. Consequently, groundwater systems in these areas will not be impacted by mining activities and these are not considered further here.

Groundwater resources in the Tropic Shale and underlying Dakota Formation in the permit and adjacent area are not appreciable. During drilling activities in the proposed Coal Hollow Mine permit and adjacent area, appreciable groundwater inflows were not encountered in the Tropic Shale. Other than a single seep (SP-37; Drawing 7-1) which discharges at a rate of less than 0.05 gpm from an apparent fracture system in a sandy horizon along the eastern margin of lower Sink Valley, no springs or seeps with

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measurable discharge have been identified in the Tropic Shale. The lack of appreciable groundwater discharge in the Tropic Shale is a result of the poor water transmitting properties of the marine shale unit. While sandstone units occur stratigraphically higher in the Tropic Shale in the surrounding area, in areas proposed for surface mining, the unit present consists of a fairly uniform sequence of soft shale, silty shale, and claystone with minor siltstone horizons. Competent sandstone strata in the Tropic Shale overlying proposed mining areas was not observed during drilling. The Tropic Shale acts as a barrier impeding downward migration of groundwater in the proposed Coal Hollow Mine permit and adjacent area where it is present. The unit also forms a basal confining layer for alluvial groundwater systems in the proposed permit area.

Groundwater discharge from the Dakota Sandstone in the permit and adjacent area is also meager. The Dakota Formation consists of shaley strata interbedded with lenticular, fine- to medium-grained sandstone and coal. Because of the pervasiveness of interbedded low-permeability horizons in the formation and the vertical and lateral discontinuity of sandstone horizons, the potential for vertical and horizontal movement of groundwater is limited. While no springs discharge from the Dakota Formation in the permit area, a spring with a discharge of about 1 gpm and displaying little seasonal variability in discharge (SP-4; Drawing 7-1) discharges from an apparent fault zone in the Dakota Formation approximately 1.1 miles south of the proposed Coal Hollow permit area. Additionally, two seeps with discharges of less than 0.05 gpm (SP-27 and SP-34; Drawing 7-1) seep from the Dakota Formation in lower Sink Valley more than ½ mile south of the proposed Coal Hollow Mine permit area. The results of slug testing performed on wells screened in the Smirl coal seam indicate relatively low values of hydraulic conductivity for the coal seam (Table 7-8). In much of the proposed mining area, the coal seam is dry (UDOGM, 2007). Thus, appreciable migration of groundwater through the Smirl coal seam is not anticipated.

No water wells are known to exist in the Tropic Shale or Dakota Formation in the proposed Coal Hollow Mine permit and adjacent area, demonstrating the inability of these formations to transmit useful quantities of water to wells. Groundwaters from the Tropic Shale and Dakota Formation do not contribute measurable baseflow to streams in the proposed permit and adjacent area (at least at the surface in stream channels).

Natural groundwater discharge in the permit and adjacent area occurs primarily from alluvial sediments. Alluvial discharge occurs both as discrete springs and seeps (Drawing 7-1) and also locally as diffuse seepage to the surface. Groundwater discharge areas in the proposed Coal Hollow Mine permit and adjacent area are shown on Drawing 7-4 (see also photograph section). The area of most appreciable alluvial groundwater discharge occurs in central Sink Valley in the northwest quarter of Section 29, T39S, R5W (see Drawing 7-4; groundwater discharge area A). The alluvial groundwater system in this area exists under artesian conditions, resulting from the presence of a considerable thickness of sloping, low permeability clayey sediments overlying coarser, water-bearing alluvial sediments at depth (See Drawing 6-3). The artesian alluvial groundwater system in Sink Valley is likely recharged via mountain-front-recharge along the flanks of the Paunsaugunt Plateau to the east and north of the proposed Coal Hollow Mine permit area.

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Mine permit area. This artesian alluvial groundwater system that exists along the eastern margins of Sink Valley is likely continuous from near mountain-front recharge areas southward along the eastern margins of Sink Valley to the lower portion of Sink Valley. Discharge from the alluvial groundwater systems in and adjacent to the proposed Coal Hollow Mine permit area occurs primarily in two areas (Drawing 7-4). In the northwest quarter of Section 29, T39S, R5W, considerable natural discharge from the alluvial groundwater system occurs through springs and seeps (Drawing 7-4; groundwater discharge area A). Minor discharge from several flowing artesian wells also occurs in this area. The artesian alluvial groundwater system in eastern Sink Valley also likely provides recharge to the clayey alluvial sediments in the southwestern portion of the valley in the proposed Coal Hollow Mine permit area. Discharge from the alluvial groundwater system in groundwater discharge area A results in decreases to the amount of water in storage in the alluvial groundwater system and also decreases in artesian hydraulic pressure in the aquifer.

Appreciable discharge from the alluvial groundwater system also occurs in lower Sink Valley in the northwest quarter of Section 32, T39S, R5W (see Drawing 7-4; groundwater discharge area B). Sink Valley constricts markedly in this area, which forces shallow alluvial groundwaters flowing down the valley to discharge at the land surface as springs, seeps, and diffuse discharge to the surface (i.e., there is a significant decrease in the cross-sectional area of the alluvial sediments). Groundwater discharge in this area occurs from diffuse seepage to the surface and also as discharges to two springs and several small seeps (Drawing 7-1).

Much of the alluvial groundwater in Sink Valley likely ultimately leaves the valley via evapotranspiration. This conclusion is based on the observation that there is very rarely any discharge of surface water (at least at the surface in the channel) in Sink Valley Wash below Sink Valley (See site SW-9; Drawing 7-2; UDOGM, 2007). The clayey, low-permeability sediments present at the surface over most of Sink Valley also impede appreciable infiltration of precipitation and snowmelt waters into the deeper subsurface. Hence, groundwater recharge to the lower half of the Sink Valley sediments (including the proposed Coal Hollow Mine permit area) likely occurs primarily via horizontal migration of alluvial groundwaters from up-gradient areas.

Flowing artesian groundwater conditions are also observed in monitoring wells screened near the base of the alluvial sediments in the northwest corner of Section 32 T39S, R5W. It is probable that the artesian alluvial groundwater system in Section 29, T39S, R5W is continuous with that in the northwest corner of Section 32. It should be noted that within the proposed Coal Hollow permit area, artesian conditions were not observed in monitoring wells. While the thickness of the alluvial sediments in the artesian groundwater system east of the proposed Coal Hollow permit area range up to 150 feet thick, the thickness of alluvium overlying areas with mineable coal in the proposed Coal Hollow permit area generally does not exceed about 50 feet and in many locations it is considerably thinner.

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Natural discharge of alluvial groundwater in the Robinson Creek drainage area is meager. This condition is largely due to the presence of the elevated ridge of impermeable Tropic Shale bedrock associated with the Sink Valley Fault that dissects and effectively isolates the alluvium east of the fault from that west of the fault (See Drawing 6-1). Because of the low permeability of the Tropic Shale, this condition apparently forces alluvial groundwater east of the Tropic Shale ridge to flow to the south toward Sink Valley that would otherwise report to the Robinson Creek drainage. During high flow conditions in the alluvial groundwater system east of the Tropic Shale ridge, minor amounts of groundwater "overtop" the bedrock ridge and drain via surface flow over the Tropic Shale bedrock, where it either recharges shallow alluvial sediments to the west of the fault or is lost to evapotranspiration. The influence of the Tropic Shale ridge is readily evident in field observations, with marked differences in vegetation and soil moisture being apparent on opposite sides of the ridge. During low-flow conditions, discharge from the overtopping of the bedrock ridge has generally not been observed. Isolated areas of soil wetness and shallow perched alluvial groundwater systems that exist west of the bedrock ridge in the northeast corner of Section 30 and the southeast corner of Section 19, T39S, R5W are likely sourced via this mechanism.

Seepage of alluvial groundwater into the deeply incised lower Robinson Creek stream channel occurs near the contact with the underlying Dakota Formation in the southeast quarter of Section 19, T39S, R5W. This water is likely related to saturated alluvial deposits underlying the Robinson Creek stream channel. The alluvial groundwater emerges near where the stream channel intersects the alluvial groundwater system. It is noteworthy that the location of the emergence of alluvial water in the channel has varied somewhat over time. The bank seepage water is likely alluvial groundwater that seeps to the surface where the incised stream channel intersects the potentiometric surface of the alluvial groundwater system. Typically, this is near the contact with the underlying Dakota Formation bedrock in the bottom of the stream channel. Because of the seasonal changes in the elevation of the potentiometric head in the alluvial groundwater system, the location of the bank seepage is variable over time (i.e. the variability in the bank seepage locations are likely controlled primarily by temporal variability in potentiometric levels in the alluvial groundwater system rather than by fixed, permeability-controlled groundwater preferential pathways in the aquifer skeleton). Consequently, the bank seepage locations are not well-defined point sources, but rather dynamic seepage fronts along this general reach of the stream.

The Robinson Creek stream channel above this location is almost always dry (except for in direct response to torrential precipitation events or during the springtime runoff season during wet years. This seepage of alluvial water in the Lower Robinson Creek channel is typically about 5 to 10 gpm or less and is routinely monitored at monitoring station SW-5 (Drawing 7-2).

Information on water quality for groundwaters and surface-waters has been uploaded into the Utah Division of Oil, Gas and Mining, Utah Coal Mining Water Quality Database (UDOGM, 2007) and is summarized and described in Appendix 7-1.

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Appreciable spatial variability exists in water quality in groundwaters and surface waters in the proposed Coal Hollow permit and adjacent area. Stiff diagrams depicting solute compositions and overall water quality for groundwaters and surface waters in the proposed Coal Hollow Mine permit and adjacent area are shown in Appendix 7-1. Important water quality characteristics for groundwaters are summarized below.

Groundwater Source	Chemical type	TDS (mg/L)
Alluvial groundwaters, coarse-grained system east of proposed permit area	Calcium-magnesium-bicarbonate	380 mg/L to 500 mg/L typically, Little seasonal variability
Alluvial groundwaters in south sink valley	Variable, magnesium-bicarbonate sulfate, calcium-magnesium-bicarbonate	450 mg/L to 3,600 typically, Highly variable based on season and climate for shallow systems, less variability in deeper system
Dakota Formation, fault groundwater system south of proposed permit area	Sodium-bicarbonate	500 mg/L to 600 mg/L typically, Little seasonal variability

It is apparent that the overall water quality of alluvial groundwater degrades from the mountain-front recharge water to the artesian groundwater system east of the proposed Coal Hollow permit area to the non-artesian shallow alluvial groundwater systems located in the more distal portions of Sink Valley. These changes are due to groundwater interaction with soluble minerals in the primarily Tropic Shale-derived sediments that make up the shallow alluvial materials in the proposed permit area.

This down-gradient degradation in water quality is shown graphically on Drawing 7-5. In Drawing 7-5, the average specific conductance values in $\mu\text{S}/\text{cm}$ for representative springs and seeps in the Sink Valley drainage are plotted on the map as circles with the circle areas being proportional to the specific conductance average for the spring or seep. The specific conductance information used in generating Drawing 7-5 has been submitted electronically to the Division's hydrology database (UDOGM, 2007). It is readily apparent from Drawing 7-5 that the specific conductance (which is a reflection of the dissolved solids concentration) is degraded from the mountain-front recharge water (represented by stream SW-8) to the artesian alluvial groundwater system in the northwest quarter of Section 29, T5W, R39S, to the alluvial groundwaters in the southern portion of Sink Valley below the Coal Hollow Mine permit area.

Specific conductance values were used for plotting in Drawing 7-5 because specific conductance values are available for all springs and seeps, while laboratory chemical analyses are available for only some of the springs and seeps. Stiff (1951) diagrams for

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selected springs along this geochemical evolutionary pathway are shown on Figure 14 of Appendix 7-1. It is apparent from the Stiff diagrams and from geochemical information submitted to the Division (UDOGM, 2007) that the mountain-front recharge water (represented by monitoring site SW-8 in upper Swapp Hollow) is of the calcium-magnesium-bicarbonate chemical type with an average TDS concentration of 333 mg/L. Groundwater downgradient of the mountain-front recharge areas in the artesian alluvial groundwater system in Section 29, T5W, R39S, is also of the calcium-magnesium-bicarbonate chemical type, with an average TDS concentration at artesian well Y-61 of 400 mg/L. Further downgradient in the artesian alluvial groundwater system in Section 29, the geochemical composition at SP-8 is of the calcium-magnesium-bicarbonate chemical type with a somewhat increased TDS concentration of 425 mg/L. In the lower portions of Sink Valley in Section 32, T5W, R39S, the chemical quality of the alluvial groundwater is appreciably degraded relative to that in the upper portions of the groundwater system. At spring SP-6, the composition of the alluvial groundwater is seasonally variable and is of the magnesium-bicarbonate-sulfate, or calcium-magnesium-bicarbonate-sulfate chemical type. The TDS concentrations at SP-6 average 970 mg/L. The chemical composition of alluvial groundwater at SP-33 is of a geochemical type similar to that at SP-6, although TDS concentrations are somewhat lower, averaging 795 mg/L. The spatial variability apparent in the TDS concentrations in the alluvial groundwater in Section 32 is likely related to flushing effects resulting from higher groundwater fluxes through zones of increased permeability in the alluvium. It is noteworthy that groundwater in the gravelly zones in the deeper alluvial east of the permit area in Section 32 monitored at the 85-foot deep well LS-85 is considerably lower in TDS concentration with an average of 457 mg/L. The lower TDS concentrations of artesian alluvial groundwater in the deeper, coarser-grained portions of the alluvium are likely attributable to the isolation of these groundwaters from the shallow, clayey, Tropic Shale derived alluvial sediment in the near-surface alluvial groundwaters.

The appreciable temporal variability in the solute geochemical compositions of the shallow alluvial groundwaters in Section 32 is likely attributable to seasonal and climatic variability in the groundwater flux rate through these systems and corresponding variability in rock/water ratios and residence time in the evaporate mineral rich Tropic Shale derived shallow alluvial sediments present in this portion of Sink Valley. Alluvial groundwaters in the deeper portions of Sink Valley to the east in Section 32 are part of a larger, more continuous groundwater system that is hydraulically isolated from overlying shallow recharge sources, and consequently have not exhibited similar temporal variability in solute geochemical composition.

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Surface Water Resources

Surface water resources in the proposed Coal Hollow Mine permit and adjacent area are described in Appendix 7-1 and are summarized below.

Surface waters in the proposed Coal Hollow Mine permit and adjacent area are tributary to Kanab Creek. Surface waters in the northern portion of the proposed permit and adjacent area drain into the Robinson Creek and upper Kanab Creek drainages. Surface waters in the southern portion of the proposed permit and adjacent area drain into the Sink Valley Wash drainage which is tributary to Kanab Creek about 6 miles below the proposed Coal Hollow Mine permit area. Surface water drainages in the permit and surrounding areas are shown in Appendix 7-1. Surface water baseline monitoring stations are shown on Drawing 7-2. Locations of surface-water water rights in and adjacent to the proposed Coal Hollow Mine permit and adjacent area are shown on Drawing 7-3. Water rights data from the proposed Coal Hollow Mine permit and adjacent area are detailed in Appendix 7-3.

Information on water quality for groundwaters and surface-waters has been uploaded into the Utah Division of Oil, Gas and Mining, Utah Coal Mining Water Quality Database (UDOGM, 2007) and is summarized and described in Appendix 7-1.

Surface waters in Kanab Creek are used for stock watering and crop irrigation in the irrigable lands adjacent to Kanab Creek west of the proposed Coal Hollow Mine permit area. Discharge in Kanab Creek measured near the town of Alton (SW-1) is seasonally dependent and largely influenced by upstream water use. Discharge in Kanab Creek monitored at SW-1 typically ranges from 10 cfs or less during the springtime runoff period to 1 cfs or less during the summertime.

Discharge in Lower Robinson Creek drainage is meager. Other than during the springtime runoff event in wet years or during torrential precipitation events, flow has not been observed at monitoring stations SW-4 and SW-101 (Drawing 7-2). Discharge at the lower monitoring site on Lower Robinson Creek (SW-5; Drawing 7-2) is meager. The small discharge occasionally present at SW-5 is derived from the seepage of alluvial groundwater into the Lower Robinson Creek stream channel between monitoring sites SW-101 and SW-5.

Tributaries to the Sink Valley Wash drainage in the proposed Coal Hollow Mine permit and adjacent areas include (from north to south) Water Canyon, an unnamed drainage south of Water Canyon in Section 21 T39S, R5W, and Swapp Hollow. Discharge rates in these drainages are highly seasonally dependent (UDOGM, 2007; Appendix 7-1). Discharges in the Water Canyon and Swapp Hollow drainages are intermittent or perennial in nature with discharge peaks occurring during the springtime runoff season and much lower flows occurring during the late summer and fall months. Discharge in the unnamed drainage in Section 21 T39S, R5W is ephemeral.

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The water quality and discharge characteristics of surface waters in the proposed Coal Hollow Mine permit and adjacent area are presented in UDOGM (2007) and described in Appendix 7-1. Solute compositions of stream waters are also depicted graphically as Stiff diagrams in Appendix 7-1. The solute compositions of surface waters in the proposed Coal Hollow Mine permit and adjacent area are summarized below.

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Source	Chemical type	TDS (mg/L)
Robinson Creek/Dry Fork	Calcium-magnesium-bicarbonate	300 mg/L typical
Lower Robinson Creek	Variable, magnesium-sulfate-bicarbonate	300 – 3,000 mg/L typical, dependent on discharge
Swapp Hollow	Calcium-magnesium-bicarbonate	250-350 mg/L typical
Kanab Creek	Magnesium-calcium-bicarbonate-sulfate during high flow, variable during low-flow, variability likely due largely to interaction with Tropic Shale soils and irrigation return flows	500-1,300 mg/L typical, Variable dependent on season and irrigation use
Sink Valley Wash	Magnesium-calcium-bicarbonate	600 -1,500 mg/L typical, variable dependent on discharge

Considerable seasonal variability exists in the solute compositions of stream waters in Kanab Creek in the proposed Coal Hollow Mine permit and adjacent area (UDOGM, 2007; Appendix 7-1). During low-flow conditions, interactions between stream waters and Tropic Shale or Tropic Shale-derived alluvial sediments likely result in increased TDS concentrations. Return flow from irrigated fields and interactions with soils rich in soluble minerals also likely contribute to increased TDS concentrations in the summertime. During the spring runoff season, high surface-water flows that originate from the adjacent upland areas dominate the flow in the channel. The TDS concentrations of Kanab Creek waters during high-flow conditions are thus lower than during the low-flow season. Much less seasonal variability in solute content in surface water flows from the mountain stream in Swapp Hollow (UDOGM, 2007; Appendix 7-1). This condition is likely attributable to the fact that the stream in Swapp Hollow, which originates on geologic formations overlying the Tropic Shale, has considerably less contact with the Tropic Shale than does Kanab Creek. Additionally, there are no known irrigation diversions or returns above the stream monitoring point (SW-8; Drawing 7-2) in Swapp Hollow.

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722.100

A map showing the locations of springs and seeps in the proposed Coal Hollow Mine permit and adjacent area is presented in Drawing 7-1. A map showing potentiometric levels in alluvial groundwater systems in the proposed Coal Hollow and adjacent areas is presented in Drawing 7-13. It is important to note that the alluvial groundwater potentiometric contours depicted in Drawing 7-13 are not representative of a laterally or vertically continuous groundwater system. Within the proposed Coal Hollow Mine permit and adjacent area, appreciable portions of the alluvial sediments are not saturated. Additionally, perched groundwater conditions are present in many locations in the alluvium in the area. In other words, the alluvial groundwater systems in the proposed Coal Hollow Mine permit and adjacent area are not a single, interconnected aquifer. Rather, there exist several areas of saturated alluvium, which may or may not be in good hydraulic communication with adjacent areas. Consequently, it is not possible or meaningful to construct a true potentiometric contour map in the strict sense. Consequently, it is not appropriate to evaluate regional potentiometric trends over large distances or to infer precise groundwater flow directions or hydraulic gradients in the alluvial groundwater system based on Drawing 7-13. The alluvial groundwater system potentiometric map presented in Drawing 7-13 is useful for evaluating approximate local potentiometric conditions and general saturation trends.

722.200

Location of surface water bodies

Within the proposed Coal Hollow Mine permit and adjacent area, no significant natural ponds or lakes occur. The locations of springs and streams are shown in Drawing 7-1. Many small earthen impoundments and ponds have been created to store surface-water runoff and spring discharge water for stock watering and irrigation use. Some of these impoundments were created by constructing straight or semi-circular berms across ephemeral surface water drainages to impound surface runoff. Because of the character of the alluvial sediments, some of the ponds have become filled with sediment over time and the holding capacities have diminished. The locations of ponds and associated conveyance ditches are shown on Drawing 7-7.

722.300

Baseline monitoring stations

Baseline monitoring stations are shown on Drawing 7-2. A map showing the locations of monitoring wells in the proposed Coal

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Hollow permit and adjacent area is presented in Drawing 7-12 and on Figure 12 of Appendix 7-1. Drawing-7-12 also shows monitoring stations from which baseline hydrologic data were collected in previous studies. Monitoring station locations, elevations, and other details are presented in Table 7-1.

722.400 Location of water wells
Water well locations are shown in Drawing 7-2 and Drawing 7-12. Well construction details and locations are presented in Table 7-2.

722.500 Contour map(s) of disturbed area(s)
Surface contours representing the existing land surface configuration of the proposed permit area (including potentially disturbed areas) are shown on Drawing 5-1 and the post mining land configuration is shown on 5-35. Cross sections with both these landforms are shown on Drawing 5-36. The premining landform, with exception of the Facilities area and Lower Robinson Creek, are from an aerial flight that was limited to a five foot contour interval. Therefore, contours have been interpolated down to a 2 foot level using the available aerial flight information. This interpolation provides accuracy for the Division to make the necessary determinations. The Facilities area and portions of Lower Robinson Creek are actual survey data to the accuracy of 2-foot contours.

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SAMPLING AND ANALYSIS

Water quality sampling and analyses have been and will be conducted according to the "Standard Methods for the Examination of Water and Wastewater" or EPA methods listed in 40 CFR Parts 136 and 434. Information regarding laboratory analytical methods utilized in performing water quality analyses at the analytical laboratories has been submitted to the Utah Division of Oil, Gas and Mining, Utah Coal Mining Water Quality Database (UDOGM, 2007).

BASELINE INFORMATION

Baseline groundwater, surface-water, geologic, and climatologic data are described in Appendix 7-1 and summarized below.

724.100

Groundwater Information

The location of wells and springs in the proposed Coal Hollow Mine permit and adjacent area are shown on Drawings 7-1 (Spring and seep survey map), 7-2 (Baseline monitoring locations), and 7-12 (Monitoring well location map). Groundwater rights in and around the proposed Coal Hollow Mine permit area are shown on Drawing 7-3 and tabulated in Appendix 7-3.

Seasonal quality and quantity of groundwater and usage is presented in Appendix 7-1 and UDOGM (2007). Baseline discharge and water quality data have been submitted electronically to the Utah Division of Oil, Gas and Mining, Utah Coal Mining Water Quality (UDOGM, 2007).

Baseline monitoring of groundwater resources in and around the proposed Coal Hollow permit area have been carried out by several entities. Previous hydrologic studies of the region have been made in the Alton Coal Field area by Goode (1964, 1966), Sandberg (1979), Cordova (1981), and Plantz (1983). Selected hydrologic data collected in conjunction with these studies have been incorporated into the hydrologic analysis and baseline data included in this permit application.

During the 1980's, extensive monitoring of groundwater resources in the proposed permit and surrounding areas was performed by Utah International, Inc. Utah International Inc.'s groundwater monitoring activities included the construction of numerous groundwater monitoring wells, aquifer testing activities, and the performance of discharge, water level, and field and laboratory water quality monitoring of springs, seeps, and wells. These baseline monitoring activities were performed as part of a proposed coal mine permitting action in the Alton Coal Field. Ultimately, the proposed

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coal mining action did not proceed. Relevant monitoring information from the Utah International, Inc. baseline monitoring activities have been included as supplemental baseline data included in this permit application.

Commencing in the 2nd quarter of 2005, regular quarterly baseline monitoring of groundwater resources has been commissioned by Alton Coal Development, LLC. Baseline monitoring of springs, seeps, and groundwater wells in and around the proposed Coal Hollow Mine permit area have been routinely performed. Data collected in the baseline monitoring activities have been submitted electronically to the Utah Division of Oil, Gas and Mining, Utah Coal Mining Water Quality Database (UDOGM, 2007).

Baseline potentiometric information from wells has been input into the DOGM database. For non-flowing-artesian wells, this information has been input in a depth-to-water-relative-to-the-top-of-the-well-casing format using units of feet. For wells experiencing flowing artesian conditions, the potentiometric data are reported to the database in feet as a height-of-the-potentiometric-surface-above-the-top-of-the-well-casing format expressed as a negative number (which makes the flowing-artesian and non-flowing-artesian potentiometric measurements directly comparable). For both conditions, the reported measurements can be directly converted to an absolute water elevation by subtracting the reported value from the elevation of the top of the well casing.

The potentiometric head in monitoring wells experiencing flowing-artesian conditions is measured either 1) by temporarily extending the height of the well casing and allowing the water level to stabilize and the performing a height of the water column measurement (where the artesian pressure is small), or 2) by using a pressure gauge to measure the shut-in artesian pressure in the well and then converting that number to an equivalent height in feet.

During December 2006 and January 2007 an extensive drilling and monitoring well construction program was implemented. This hydrogeologic program included the installation of 30 groundwater monitoring wells in and adjacent to the proposed Coal Hollow Mine permit area. The focus of the drilling program was to characterize the stratigraphy and hydrogeologic properties of alluvial groundwater systems in and adjacent to proposed mining areas. Aquifer characterization of the alluvial groundwater system was also performed using pump testing and slug testing techniques. Investigative methods utilized and the results of the analysis of the data are described in Appendix 7-1.

724.200

Surface Water Information

The locations of streams, stock watering ponds, and conveyance ditches in the proposed Coal Hollow Mine permit and adjacent area are shown on Drawing 7-7. Surface-water rights in and adjacent to the proposed Coal Hollow Mine permit area are shown on Drawing 7-3 and tabulated in Appendix 7-3. Surface-water discharge rates and water quality data have been submitted electronically to the Utah Division of Oil, Gas and

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Mining, Utah Coal Mining Water Quality Database (UDOGM, 2007). Additional surface-water information is provided in Appendix 7-1.

It is not anticipated currently that discharge from the proposed Coal Hollow Mine will be necessary. Where necessary, alluvial groundwater that may be intercepted by mining will be placed in drains and diverted away from disturbed areas and discharged (i.e., as groundwater dewatering). However, a Utah UPDES discharge permit will be obtained so that if discharge of mine water becomes necessary, it can be discharged in accordance with the UPDES discharge permit. The exact locations of mine water discharge points will be established upon issuance of the UPDES discharge permit. Any mine discharge water will be placed in either the Lower Robinson Creek drainage or the Sink Valley Wash drainage. Both of these drainages are tributary to Kanab Creek.

As described in R645-301-728.320, acid drainage is not expected from the proposed mining operation. This is due to the pervasiveness of carbonate minerals in the mine environment that will neutralize any acid produced.

Seasonal quality and quantity of groundwater and usage is described herein and in Appendix 7-1. Baseline discharge and water quality data have been submitted electronically to the Utah Division of Oil, Gas and Mining, Utah Coal Mining Water Quality (UDOGM, 2007).

Baseline monitoring of surface-water resources in and around the proposed Coal Hollow permit area have been carried out by several entities. Previous hydrologic studies of the have been made in the Alton Coal Field area by Goode (1964, 1966), Sandberg (1979), Cordova (1981), and Plantz (1983). Selected hydrologic data collected in conjunction with these studies have been incorporated into the baseline data as part of this permit application.

During the 1980's, extensive monitoring of surface water resources in the proposed permit and surrounding areas was performed by Utah International, Inc. Utah International Inc.'s groundwater monitoring activities included the operation of continuous recording stations on selected streams, and the performance of routine surface-water discharge measurements and field and laboratory water quality analyses. These baseline monitoring activities were performed as part of a proposed coal mine permitting action in the Alton Coal Field. Ultimately, the proposed coal mining action did not proceed. Relevant monitoring information from the Utah International, Inc. baseline monitoring activities have been included as supplemental baseline data as part of this permit application.

Commencing in the 2nd quarter of 2005, regular quarterly baseline monitoring of surface-water resources has been commissioned by Alton Coal Development, LLC. Baseline monitoring of surface-waters in and around the proposed Coal Hollow permit area, including surface-water discharge measurements and field and laboratory water quality analyses, have been routinely performed.

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All surface waters in the proposed Coal Hollow Mine permit and adjacent area are tributary to the Kanab Creek drainage. Surface-water monitoring stations from which baseline data have been collected are shown on Drawing 7-2 and include the following:

Sink Valley Wash drainage

SW-8 (Swapp Hollow above proposed mining areas), SW-7 (unnamed drainage in Section 21, T39S, R5W), RID-1 (irrigation diversion of water from Water Canyon drainage above proposed mining areas), SW-6 (headwaters of unnamed tributary to lower Sink Valley Wash), SW-9 (Sink Valley Wash below proposed mining areas), and SW-10 (unnamed tributary to Sink Valley Wash approximately 1.7 miles south of proposed mining areas).

Lower Robinson Creek drainage

SW-4 (Robinson Creek above proposed mining areas), SW-101 (Lower Robinson Creek near proposed mining areas), BLM-1 (Lower Robinson Creek adjacent to proposed mining areas) and SW-5 (Lower Robinson Creek below proposed mining areas).

Kanab Creek drainage

SW-1 (Kanab Creek near Alton, Utah; above proposed mining areas), SW-3 (Kanab Creek above proposed mining areas), and SW-2 (Kanab Creek below Lower Robinson Creek and below proposed mining areas). Additionally baseline hydrologic data from Lamb Canal, which is an irrigation ditch that conveys water from a diversion in Kanab Creek to irrigated lands adjacent to Kanab Creek west of proposed mining areas, is also collected.

724.300 Geologic Information

Geologic information in sufficient detail to determine the probable hydrologic consequences of mining and determine whether reclamation as required by R645 can be accomplished is given in Chapter 6 of this permit application package and in Appendix 7-1.

724.400 Climatological Information

Climatological information, including temperature and precipitation data, have been routinely measured and recorded at the Alton, Utah weather station (420086) since 1928. The station is located in the town of Alton, approximately two miles north of the proposed Coal Hollow Mine permit area. Climatological data collected at the Alton station for the 77 year period from 1928 to 2005 are summarized in Table 7-3.

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728 PROBABLE HYDROLOGIC CONSEQUENCES (PHC) DETERMINATION

This section describes the probable hydrologic consequences of surface coal mining in the proposed Coal Hollow Mine permit area. This determination is based on data presented herein and on information provided in Appendix 7-1. This mining and reclamation plan has been designed to minimize potential adverse impacts to the hydrologic balance. It should be noted that this PHC and also Appendix 7-1 may be updated periodically as required as additional hydrogeologic information and mining data become available in the future.

728.310 Potential adverse impacts to the hydrologic balance

Other than the possible short-term diminution in discharge rates from alluvial groundwater systems, including the potential short-term diminution of discharge rates from some springs and seeps in Sink Valley, appreciable adverse impacts to the hydrologic balance, either on or off the permit area are not expected to occur. The basis for this determination is discussed below.

As discussed in Section 721 above, minimal groundwater resources exist in the Tropic Shale, which directly overlies the coal reserves in proposed mining areas. Groundwater in the Tropic Shale does not provide measurable baseflow discharge to streams in the area. The lack of appreciable groundwater flow in the Tropic Shale is a result of the poor water transmitting properties of the marine shale unit. Consequently, it is anticipated that little groundwater will be encountered in the Tropic Shale in mining areas. Thus, the potential for adverse impacts to the hydrologic balance resulting from mining through the Tropic Shale in the proposed Coal Hollow Mine permit area is minimal.

Similarly, as described in Section 722 above, groundwater resources in the Dakota Formation underlying the coal seam to be mined are not appreciable. This condition is fundamentally a result of the heterogeneity of the rock strata in the Dakota Formation which impedes the ability of the formation to transmit groundwaters significant distances vertically or horizontally. The presence of the essentially impermeable Tropic Shale on top of the Dakota Formation also minimizes the potential for vertical recharge to the Dakota Formation. Mining operations will remove the overlying Tropic Shale rock strata from the Dakota Formation in addition to the Smirl coal seam deposit at the top of the Dakota Formation in mined areas. However, because the pre-mining hydraulic communication between the Tropic Shale and the underlying Dakota Formation in planned mining areas is believed to be minimal, the removal of the Tropic Shale overburden and Smirl coal seam from the Dakota Formation, followed by the rapid backfilling of pit areas with low-permeability fill materials should not result in adverse impacts to the hydrologic balance in the Dakota Formation (i.e., the post-mining degree

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of hydraulic communication between the Dakota Formation and the overlying low-permeability backfill material will be similar to that of the pre-mined condition).

It should be noted that the first water-bearing strata underlying the coal seam to be mined in the proposed Coal Hollow Mine permit area from which appreciable quantities of groundwater can be produced is the Navajo Sandstone. The Navajo Sandstone aquifer is of regional significance in that it provides groundwater of good quality to domestic, agricultural, and municipal wells regionally and provides baseflow to springs and streams. The Navajo Sandstone does not crop out in the proposed Coal Hollow Mine permit and adjacent area. The formation is effectively isolated from proposed mining areas by more than 1,000 feet of rock strata of the Dakota and Carmel Formations (which includes large thicknesses of low-permeability shales and siltstones). The Navajo Sandstone aquifer will not be impacted by proposed mining operations. It should be noted that some previously proposed mining operations in the Alton Coal Field have proposed drilling and pumping of large amounts of groundwater from high-capacity production wells in the Navajo Sandstone aquifer for operational use. No such wells are planned in the proposed Coal Hollow Mine permit and adjacent area.

Of primary importance to the hydrologic balance in the proposed Coal Hollow Mine permit and adjacent area are alluvial groundwater systems. As discussed in Section 722 and in Appendix 7-1, alluvial groundwater systems in the area support springs, seeps, diffuse groundwater discharge, and a limited number of wells. The bulk of the alluvial groundwater flux through the area occurs in alluvial sediments that include coarse-grained and finer-grained sediments near the eastern margins of Sink Valley, east of the proposed Coal Hollow Mine permit area. Lesser quantities of alluvial groundwater migrate through finer-grained alluvial sediments (predominantly clays, silts, and sands) in the western portions of Sink Valley and in the Lower Robinson Creek drainage within the proposed Coal Hollow Mine permit area. Discharges from alluvial groundwater systems in Sink Valley do not contribute measurable quantities of baseflow to streams (at least at the surface in the stream channel). Alluvial groundwater systems in the Lower Robinson Creek area are much less extensive than the alluvial groundwater systems in Sink Valley. Other than the emergence of small quantities of alluvial groundwater from the stream banks where the stream channel intersects the alluvial groundwater system, discharge from the alluvial groundwater system as springs or seeps in Lower Robinson Creek is generally not observed. Perched groundwater conditions exist locally in the alluvial groundwater system in the Lower Robinson Creek drainage.

In the general sense, surface coal mining activities in the proposed Coal Hollow Mine permit area have the potential to impact groundwater systems primarily through three mechanisms:

- 1) Where water-bearing strata in proposed mining areas are mined through, groundwater systems within these strata will obviously be directly intercepted,
- 2) Where groundwater flow paths through mine openings are interrupted, groundwater flow in down-gradient areas could be diminished, and

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- 3) Where mine openings intercept permeable strata, groundwater resources in up-gradient areas could potentially be diminished if appreciable quantities of groundwater were to be drained from up-gradient areas.

The potential for the occurrence of each of these potential impacts are described in the following.

Direct Interception of Groundwater Resources

As discussed above, groundwater resources in the relatively impermeable Tropic Shale in the proposed permit area are meager. Consequently, it is improbable that direct interception of appreciable groundwater in the Tropic Shale will occur. Additionally, because Tropic Shale groundwater systems generally do not support discharges to springs or provide baseflow to streams, the potential interception of limited quantities of groundwater in the Tropic Shale will not adversely impact the hydrologic balance. Similarly, groundwater resources in the Dakota Formation (including within the Smirl coal seam) are meager. While the Smirl coal seam will be extracted through mining operations, the underlying strata of the Dakota Formation will not be disturbed. Consequently, adverse impacts to groundwater systems in the Dakota Formation through direct interception of groundwater resources are not anticipated.

Alluvial groundwater systems in planned mining areas in the proposed Coal Hollow Mine permit area will be directly intercepted by the mine openings. It is not anticipated that the direct interception of shallow alluvial groundwater will adversely impact the overall hydrologic balance in the region. This is because no substantial springs, seeps or other important groundwater resources have been identified in proposed mine pit areas (Drawing 7-1). In the pre-mining condition, any diffuse groundwater discharge to the ground surface that occurs is primarily lost to evapotranspiration and does not contribute appreciably to the overall hydrologic balance in the area.

Because of the prevailing low-permeabilities of the alluvial sediments within the proposed mine disturbance area, it is unlikely that the direct mining of the alluvial groundwater system within these areas could cause impacts to subirrigation and soil moisture contents in up-gradient areas.

It is considered likely that the average hydraulic conductivity of the placed run-of-mine backfill material will be low. This is because of the pervasiveness of low-permeability, clay-rich materials in the mine overburden and the anisotropic nature of the placed fill material. Consequently, the potential for the migration of appreciable quantities of groundwater through the fill is considered low. However, to minimize the potential for long-term impacts to the alluvial groundwater system in Sink Valley up-gradient of mining areas that could occur as a result of the long-term draining of alluvial groundwater into the pit backfill area, a permanent, engineered low-permeability barrier will be emplaced adjacent to the undisturbed alluvial sediments along the eastern edge of

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the pit 15 disturbance area. Information and design details for this low-permeability barrier are provided in Appendix 7-10. Accordingly, the potential for impacts to subirrigation and soil moisture in the lands up-gradient of mining areas will be minimized by both the placement of the low-permeability backfill, and the emplacement of the low-permeability engineered barrier adjacent to Pit 15.

The potential for short-term impacts to subirrigation and soil moisture in the lands up-gradient of proposed mining areas will be minimized through the implementation of the hydrology resource contingency plan described in Appendix 7-9.

Diminution of down-gradient groundwater resources

Where groundwater flow paths that convey groundwater to down-gradient areas exist in areas that will be mined, there is the potential that diminution of down-gradient groundwater resources could occur. In the proposed Coal Hollow Mine permit area, it is considered unlikely that appreciable diminution of down-gradient resources will occur as a result of mining and reclamation activities. The basis of this conclusion is presented below.

Groundwater resources in the Tropic Shale are meager and groundwater flow rates are very slow through the marine shale unit. Groundwater systems in the Tropic Shale do not support appreciable spring or seep discharge nor do they provide measurable baseflow to streams down-gradient of mining areas. Consequently, the potential for adverse impacts to the hydrologic balance as a result of mining through Tropic Shale is considered minimal.

Similarly, groundwater resources in the Dakota Formation are meager. The potential for lateral and vertical migration of groundwater through the formation is limited by the pervasiveness of low-permeability shaley strata in the formation and the lateral discontinuity of permeable strata. Groundwater systems in the Dakota Formation do not support appreciable spring or seep discharge nor do they provide measurable baseflow to streams down gradient of mining areas. Additionally, with the exception of the relatively low-permeability Smirl coal seam located at the top of the formation, groundwater systems in Dakota Formation rock strata below the coal seam will not be disturbed by mining and reclamation activities. Consequently, the potential for adverse impacts to the hydrologic balance as a result of mining through Dakota Formation strata is considered minimal. It should be noted that spring SP-4 discharges at about 1 gpm approximately 1.1 miles south of the proposed Coal Hollow Mine permit area from an apparent fault/fracture system in the Dakota Formation that may be related to the Sink Valley Fault. It is unlikely that appreciable migration of groundwater through the Sink Valley Fault system in the relatively impermeable Tropic Shale or shallow alluvium in the proposed Coal Hollow Mine permit area occurs. Consequently, it is considered unlikely that mining and reclamation activities in the proposed Coal Hollow Mine permit area will cause a diminution of discharge from spring SP-4.

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Alluvial groundwater systems in proposed mining areas are supported primarily by clays, silts, and fine-grained sands. In proposed mining areas in Sink Valley, appreciable coarse-grained alluvial sediments were not encountered in drill holes or back-hoe excavations. Significant layers of clean coarse alluvium, which could rapidly convey significant amounts of groundwater, were likewise not observed. The results of slug testing performed on wells in and adjacent to proposed mining areas likewise suggest that the potential for rapid migration of groundwaters through alluvial sediments in proposed mining areas is low (Tables 7-8 and 7-9). These data and observations suggest that the flux of groundwater migrating through the alluvial sediments in proposed mining areas in Sink Valley (that could support down-gradient groundwater systems) is not large. Much of the groundwater migrating through the alluvial sediments in proposed mining areas (in the East ¼ of Section 30, T39S, R5W) likely leaves the groundwater system through diffuse discharge to the land surface and is lost to evapotranspiration and does not contribute to the overall hydrologic balance in the area. In Sink Valley, a preferential pathway for alluvial groundwaters through deep coarse-grained alluvial sediments likely exists along the east side of Sink Valley. While the thickness of the alluvium in proposed mining areas in Sink Valley generally does not exceed 50 feet (and in many locations is much less), the alluvial sediments along the eastern side of Sink Valley adjacent to proposed mining areas range from about 120 to 140 feet. Of the total flux of groundwater through the alluvial groundwater systems in Sink Valley, most of the flux is likely through this coarse-grained portion of the system. The percentage of the total flux that migrates through clayey and silty alluvial sediments in proposed mining areas along the western flanks of Sink Valley is likely much less.

It should be noted that highly permeable strata were encountered from about 60 to 75 feet depth just above the bedrock interface at the SS well cluster (monitoring well SS-75; Table 7-2). This well is screened in an area of burned or eroded coal (the coal is absent) and consequently, mining will not occur at this location. The coal seam is present at the nearby C9 cluster area. Were mining operations to intercept this highly permeable zone, substantial groundwater inflows into the mine openings could occur. Consequently, prior to surface mining in this area, the boundary between the competent coal seam and the area of burned or eroded coal will be more precisely defined by drilling or other suitable techniques such that mine openings can be designed to avoid these areas of potentially large groundwater inflows.

As discussed in Section 722 above, alluvial groundwater from Sink Valley discharges to several springs and seeps and as diffuse discharge to the ground surface in the northwest ¼ of Section 32, T39S, R5W (see Drawing 7-4; groundwater discharge area B). This groundwater discharge is likely a result of the constriction in Sink Valley in this area and the corresponding decrease in the cross-sectional area of the alluvial sediments in the valley, which forces groundwater to discharge at the surface. Most of the groundwater discharge in this area is likely derived from the up-gradient alluvial groundwater systems in the eastern portion of the valley (i.e., the coarse-grained portion of the alluvial groundwater system), which is situated east of the proposed Coal Hollow Mine permit area. This conclusion is based on 1) the substantially larger cross-sectional area of the

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alluvium in the deeper eastern portion of the valley relative to that in proposed mining areas near the western margins of the valley, 2) the higher hydraulic conductivity of the sediments in the coarse-grained part of the alluvial system, and 3) the lack of other apparent discharge mechanisms for the coarse-grained system further downstream in Sink Valley Wash (i.e., there are no significant alluvial springs or seeps further downstream in Sink Valley Wash and the system apparently does not contribute measurable baseflow to Sink Valley Wash further downstream (at least at the surface in the stream channel, as evidenced by the lack of baseflow in the wash monitored at SW-9).

Because most of the alluvial groundwater discharge supporting springs and seeps in this area is likely not derived from groundwater systems that underlie planned mining areas in the proposed Coal Hollow Mine permit area, it is considered unlikely that discharges from the springs and seeps in northwest $\frac{1}{4}$ of Section 32 T39S, R5W will be appreciably diminished as a result of the proposed mining and reclamation activities. While considered unlikely, some temporary impacts to discharge rates from springs and seeps in this area are possible. In particular, it should be noted that mining in the southernmost portions of the proposed Coal Hollow Mine permit area has a somewhat greater potential to decrease groundwater discharge rates at spring SP-6, which is located about 600 feet below the southernmost proposed mining areas (Drawing 7-2). SP-6 is an alluvial seep which has been impounded with an earthen dam from which measurable discharge is generally not present.

It is critical to note that individual mine pits in this area will remain open for short lengths of time, generally no more than about 60 to 120 days (measured from the time the mining of the pit is completed to the time the pit is backfilled). Mining operations in the vicinity near the alluvial groundwater discharge area in the northwest $\frac{1}{4}$ of Section 32 T39S, R5W are planned to be completed in about 1 year. Thus, any potential impacts to discharge rates from down-gradient groundwater systems will be short-lived. Following the backfilling and reclamation of mine openings, the potential for interception or re-routing of alluvial groundwater away from the groundwater discharge area in northwest $\frac{1}{4}$ of Section 32 T39S, R5W will be negligible. As stated above, most of the flux through the Sink Valley alluvial groundwater system that supports springs and seeps in the area occurs in the eastern portion of the valley, which will not be impacted by mining and reclamation activities. Consequently, long-term impacts to discharge rates from springs and seeps in this area are not anticipated. It should also be noted that if increased quantities of groundwater were to be encountered in mine workings in lower Sink Valley such that the water would need to be discharged to surface drainages, the mine water will ultimately be discharged to the Sink Valley Wash drainage (i.e., the water will remain in its drainage basin).

Alluvial groundwater systems in the Lower Robinson Creek area are much less extensive than the alluvial groundwater system in Sink Valley. Perched groundwater conditions exist locally in the alluvial groundwater system in the Lower Robinson Creek drainage. Other than the re-emergence of alluvial groundwater flowing beneath the Lower Robinson Creek stream channel where the stream channel exists directly on bedrock substrate, discharges from the alluvial groundwater system as springs or seeps in Lower

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Robinson Creek are not observed. Consequently, mining operations in the Lower Robinson Creek drainage will likely not result in diminution of down-gradient groundwater resources.

It should be noted that the proposed Coal Hollow Mine plan calls for the temporary diversion of a reach of the Lower Robinson Creek stream channel approximately 2,000 feet in length in the southeast $\frac{1}{4}$ of Section 19, T39S, R5W. Details of the proposed diversion are given in Chapter 5, Section 527.220 of this MRP. If this action results in diminution of groundwater or surface-water resources, where required a suitable mitigation for this potential impact will be designed and implemented in consultation with the Division of Oil, Gas and Mining.

If any Utah State appropriated water rights are impacted by mining and reclamation operations in the proposed Coal Hollow Mine, these will be replaced according to all applicable Utah State laws and regulations using the designated water replacement source described in Section 727 above.

Draining of up-gradient groundwater resources

Where surface mining occurs adjacent to up-gradient groundwater systems, there is a potential that draining of groundwater from the up-gradient groundwater system into the mine voids could occur. This condition could occur if a sufficiently large and permeable stratum were to be intercepted that is in good hydraulic communication with the up-gradient groundwater system through which appreciable quantities of water could be transmitted.

To more fully evaluate the potential for draining of up-gradient groundwater resources, a field investigation was performed during the winter of 2006-2007 that was designed to facilitate the characterization of the alluvial groundwater system in the proposed Coal Hollow Mine permit and adjacent area. Specifically, this program was designed 1) to better define the vertical and lateral extent of permeable, coarse-grained sediments in the alluvial groundwater system, 2) to characterize the water bearing and water transmitting properties of alluvial sediments, and 3) to evaluate the degree of hydraulic communication between the coarse-grained portion of the alluvial system in Sink Valley and the clayey alluvial sediments in proposed mining areas.

This field investigation included 1) the drilling and installation of 30 monitoring wells, 2) the performance of a 28-hour pumping and recovery test on the alluvial testing production well Y-61 (which is a 6.625-inch well constructed in 1980 as part of a previous coal mining application for groundwater pumping for alluvial aquifer testing) with contemporaneous measuring of water levels in the monitoring well network and contemporaneous measuring of spring discharge rates at three alluvial springs, and 3) the slug testing of 20 monitoring wells to determine approximate values of hydraulic conductivity. The results of the field investigation including analysis of the data collected in the investigation are presented in Appendix 7-1 and are summarized below.

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Other than occasional pebbles or small rocks, coarse-grained sediments (i.e., gravels and coarse sands) were not encountered in the drilling of wells along the eastern margins of proposed mining areas in Sink Valley (C1, C2, C3, and C4 well clusters). (It should be noted that the C2 well cluster is located west of the eastern limit of the mine disturbance. The mine openings will intercept the C2 well cluster and the area to the east to locations west of well Y-102). Rather, the sediments encountered in the drilling of these wells were dominated by clays and silts with subordinate amounts of fine-grained sand. Similarly, coarse-grained deposits were not encountered in well clusters C6, C7, C8, and C9. There was no indication during drilling of any appreciable thickness of highly permeable strata through which groundwater could rapidly be transmitted (although it should be noted that the presence of thin sand layers are difficult to identify in wet auger drilling returns). Similarly, appreciable amounts of high-permeability coarse-grained alluvial sediments were not noted in alluvial sediments investigated in backhoe excavated pits and erosional escarpments in Sink Valley.

The hydraulic heads measured in alluvial monitoring wells near proposed mining areas in Sink Valley (C2, C3, C4, C7, C8, and C9) did not indicate artesian pressures. Rather, marked upward or downward vertical hydraulic gradients were not observed in any of these areas and water levels were consistently within several feet of the ground surface.

The results of pump testing in the alluvial groundwater system demonstrate that the springs in the northwest $\frac{1}{4}$ of Section 29, T39S, R5W are in direct hydraulic communication with the coarse-grained alluvial groundwater system in which the pumping well Y-61 is screened. Discharge rates (or water levels at Sorensen Spring) measured at each of the four springs (SP-8, SP-14, SP-20, and Sorensen spring) monitored during the 28-hour pumping test responded to pumping at the well. Monitoring wells at clusters C2, C3, and C4 near the easternmost proposed mining areas also showed small, muted responses, with declines measured in water levels during the 28-hour test ranging from about 0.05 to 0.10 feet. Other monitoring wells in proposed mining areas did not respond measurably to pumping at Y-61. It should be noted that after the pumping well was turned off at the end of the 28-hour pumping test, spring discharge rates and water levels in alluvial monitoring wells recovered to approximate pre-testing levels.

The results of slug testing of wells in the proposed Coal Hollow Mine and adjacent area are presented in Table 7-8. Using these hydraulic conductivity values together with measured thicknesses of saturated alluvial sediments determined during drilling, and hydraulic gradient values determined from water levels measured in monitoring wells, rates of estimated groundwater inflows to mine openings have been calculated using Darcy's Law (Table 7-9).

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Darcy's Law may be expressed as.

$$Q = KIA$$

Where	Q	=	groundwater discharge rate
	K	=	hydraulic conductivity
	I	=	hydraulic gradient
	A	=	cross-sectional area

The values listed in Table 7-9 are reported as inflow rates per 100 lineal feet of mine openings oriented perpendicular to the groundwater flow direction. Calculations at individual locations are adjusted for the thickness of the saturated alluvium at that location. For all calculations in Table 7-9, a gradient of 0.10 has been used, which is considered a conservative estimate for the alluvial groundwater system in the vicinity of the planned Coal Hollow Mine workings. It is important to note that while values for saturated aquifer thickness and local hydraulic gradient in the alluvial groundwater system can be determined relatively precisely, hydraulic conductivity values determined from slug testing methods are generally considered as order-of-magnitude estimates. Consequently, the information from Table 7-9 should be used for general purposes only. The estimated groundwater inflow rates presented in Table 7-9 suggest that copious, unmanageable amounts of alluvial groundwater will likely not be encountered. It should be noted, however, that alluvial sediments located east of the C2 well cluster may contain coarser grained sediments similar to those intercepted in well Y-102. Special mining protocols will be employed (See Appendix 7-9) when mining in this area (pit15; see Section 728.333) to minimize the potential for interception of large groundwater inflows.

As surface mining operations advance toward the alluvial groundwater discharge area in the northwest ¼ of Section 29, T39S, R5W (See Drawing 7-4; groundwater discharge area A), the information in Table 7-9 suggests that groundwater inflow rates in this area will be modest, generally on the order of a few tens of gallons per minute or less per 100 lineal feet of mine opening. However, it should be noted that, as discussed above, if mine openings in this area were to intersect a substantial thickness of coarse-grained alluvial material that was in good hydraulic communication with the coarse-grained alluvial system located along the eastern margins of Sink Valley, substantially greater rates of groundwater inflow could occur. Based on the information in Tables 7-8 and 7-9, this is not considered likely.

As mining operations advance toward the alluvial groundwater discharge area in the northwest ¼ of Section 29, T39S, R5W (See Drawing 7-4; groundwater discharge area A) and groundwater discharge from up-gradient alluvial groundwater systems occurs, there is the potential that discharge rates from alluvial springs in this area could be diminished. The magnitude of this potential impact will be largely dependent on the

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drainage rate and volume of groundwater that may be drained from the up-gradient alluvial groundwater system.

The potential for diminution of discharge from alluvial springs near proposed mining areas near the northwest $\frac{1}{4}$ of Section 29, T39S, R5W will be minimized because:

- 1) As mining progresses toward the groundwater discharge area in the northwest $\frac{1}{4}$ of Section 29, T39S, R5W (see Drawing 7-4, groundwater discharge area A), groundwater inflows into mine openings and discharge rates from the nearby alluvial springs will be closely monitored. If groundwater inflow rates into mine openings are excessive, where necessary Alton Coal Development, LLC will use a suitable technique to minimize groundwater inflow rates into the mine. These techniques may include the use of bentonite or natural clay filled cutoff walls or other means where appropriate to isolate and protect groundwater resources up-gradient of mining activities, and
- 2) Individual mine pits in the proposed Coal Hollow Mine will remain open for short lengths of time, generally no more than about 60 to 120 days (measured from the time the mining of the pit is completed to the time the pit is backfilled). Consequently, any potential impacts to spring discharge rates in the alluvial groundwater system in this area will likely be short-lived. Because the alluvial groundwater recharge areas are located well up-gradient of proposed mining areas (mountain-front recharge) and will not be impacted, recharge to the alluvial system should continue uninterrupted, it is anticipated that water levels in the artesian groundwater system should recover from any mining-related declines in hydraulic head subsequent to the completion of mining in the area.

Groundwater discharge from the springs in the northwest $\frac{1}{4}$ of Section 29, T39S, R5W (See Drawing 7-4; groundwater discharge area A) do not contribute any measurable baseflow discharge to streams in the area. This conclusion is based on the lack of any baseflow discharge in streams down-gradient of this area in Sink Valley (see monitoring data for SW-6 and SW-9). Rather, most of this discharge is likely ultimately lost to evapotranspiration as the water migrates across the low-permeability, near-surface clayey sediments in Sink Valley. Consequently, the potential temporary diminution of discharge from alluvial springs in the northwest $\frac{1}{4}$ of Section 29, T39S, R5W would not result in appreciable adverse impacts to the surrounding hydrologic balance.

It is considered likely that the average hydraulic conductivity of the placed run-of-mine backfill material will be low. This is because of the pervasiveness of low-permeability, clay-rich materials in the mine overburden and the anisotropic nature of the placed fill material. Consequently, the potential for the migration of appreciable quantities of groundwater through the fill is considered low. However, to minimize the potential for long-term impacts to the alluvial groundwater system in Sink Valley up-gradient of mining areas that could occur as a result of the long-term draining of alluvial groundwater into the pit backfill area, a permanent, engineered low-permeability barrier

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will be emplaced adjacent to the undisturbed alluvial sediments along the eastern edge of the pit 15 disturbance area. Information and design details for this low-permeability barrier are provided in Appendix 7-10. An evaluation of the permanent barrier for pit 15 has been performed by Mr. Alan O. Taylor of Taylor Geo-Engineering, LLC. Information in the Taylor Geo-Engineering report indicates that the 50-foot wide barrier will prevent any appreciable drainage of alluvial groundwater from the coarse-grained alluvial groundwater system centered east of the permit area into the backfilled pit areas. Laboratory analysis of the Tropic Shale material from which the barrier will be constructed indicates that the compacted shale material will perform adequately to successfully contain the alluvial groundwater. Using this technique, the pit areas will be reclaimed to restore the approximate pre-existing groundwater levels in Sink Valley.

Accordingly, the potential for impacts to subirrigation and soil moisture in the lands up-gradient of mining areas will be minimized by both the placement of the low-permeability backfill, and the emplacement of the low-permeability engineered barrier adjacent to Pit 15.

The potential for short-term impacts to subirrigation and soil moisture in the lands up-gradient of proposed mining areas will be minimized through the implementation of the hydrology resource contingency plan described in Appendix 7-9.

If any Utah State appropriated water rights are impacted by mining and reclamation operations in the proposed Coal Hollow Mine, these will be replaced according to all applicable Utah State laws and regulations using the designated water replacement source described in Section 727 above.

728.320 Presence of acid-forming or toxic-forming materials

Chemical information on the acid- and toxic-forming potential of earth materials naturally present in the proposed permit area are presented in Appendix 6-2. Chemical information on the low-sulfur Smirl coal seam proposed for mining is presented in Appendix 6-1 (confidential binder). Based on laboratory analytical data, it is apparent that acid-forming and toxic-forming materials that could result in the contamination of surface-water or groundwater supplies in the proposed Coal Hollow Mine permit and adjacent area are generally not present.

Selenium was not detected in any of the samples from the proposed Coal Hollow Mine permit area. Likewise, concentrations of water-extractable boron were also low, being less than 3 mg/kg in all samples analyzed. The pH of groundwaters in and around the proposed Coal Hollow Mine permit area are moderately alkaline (UDOGM, 2007). Data in Appendix 6-2 likewise indicate moderately alkaline conditions in sediments in the proposed permit area. The solubility of dissolved trace metals is usually limited in waters with alkaline pH conditions. Consequently, high concentrations of these metals

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constituents in groundwaters and surface waters with elevated pH levels are not anticipated. Additionally, most of the materials that will be handled as part of mining and reclamation activities in the proposed Coal Hollow Mine area are of low hydraulic conductivity (i.e. clays, silts, shales, siltstones, claystones, etc.). Consequently, it is anticipated that groundwater seepage volumes through low-permeability backfill and reclaimed land surfaces in reclaimed mine pit areas and excess spoils storage areas will not be large. Additionally, reclaimed areas will be regraded, sloped, and otherwise managed to minimize the potential for land erosion, to restore approximate surface-water drainage patterns, and also to minimize the potential for ponding of surface waters on reclaimed areas (other than "roughening" or "gouging" of some areas to enhance reclamation). Thus, the potential for interactions between large amounts of disturbed earth materials and groundwaters and surface waters, which could result in leaching of chemical constituents into groundwater and surface-water resources, will be minimized.

Additionally, the mining plan calls for the emplacement of 40 inches of suitable cover material over backfilled areas made up of material types which could appreciably impact vegetation (materials with elevated SAR ratios or other physical or chemical characteristics that could adversely impact vegetation).

The neutralization potential greatly exceeded the acid potential in all samples analyzed, with the neutralization potential commonly exceeding the acid potential by many times, suggesting that acid-mine-drainage will not be a concern at the proposed Coal Hollow Mine. Acid-forming materials in western coal mine environments often consist of sulfide minerals, commonly including pyrite and marcasite, which, when exposed to air and water, are oxidized causing the liberation of H^+ ions (acid) into the water. Oxidation of sulfide minerals may occur in limited amounts in the mine pits where oxygenated water encounters sulfide minerals. However, the acid produced by pyrite oxidation is quickly consumed by dissolution of abundant, naturally occurring carbonate minerals (Appendix 6-2). Dissolved iron is readily precipitated as iron-hydroxide in well aerated waters, and consequently excess iron is not anticipated in mine discharge water.

Other acid-forming materials or toxic-forming materials have not been identified in significant concentrations nor are such suspected to exist in materials to be disturbed by mining.

Because of the overall low-permeability of the rock strata and sediments surrounding the mine workings (primarily the shales and claystones of the lower Tropic Shale), the potential for seepage of mine water outward into adjacent stratigraphic horizons is low. Additionally, because the floors of the mine pits need to be accessible in order to extract the coal, the mining operations will be carried out in such a manner that the accumulation of large amounts of water in the mine pits will be avoided.

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Sediment yield from the disturbed area.

Erosion from disturbed areas will be minimized through the use of silt fences and other sediment control devices. Surface runoff occurring on disturbed areas will be collected and treated as necessary to remove suspended matter. Four diversion ditches along with four sediment impoundments are proposed for the permit area. In addition, miscellaneous controls such as silt fence and berms are also proposed for specific areas. The proposed locations for these structures are shown on Drawing 5-3. Details associated with these structures can be viewed on Drawings 5-25 through 5-34 and Appendix 5-2.

The smallest practicable area, consistent with reasonable and safe mine operational practices will be disturbed at any one time during the mining operation and reclamation phases. This will be accomplished through progressive backfilling, grading, and prompt revegetation of disturbed areas. The backfilled material will be stabilized by grading to promote a reduction of the rate and volume of runoff in accordance with the applicable requirements. The excess spoil and fill above approximate original contour will be graded to a maximum 3h:1v slope and revegetated to minimize erosion.

Cut ditches will be established on the shoulders of all primary roads to control drainage and erosion. Cut and fill slopes along the primary roads will be minimal and are not expected to cause significant erosion. In locations where there are culvert crossings (i.e. Lower Robinson Creek), the fills slopes will be stabilized by utilizing standard methods such as grass matting or straw wattles. The location and details for roads can be viewed on Drawings 5-3 and 5-22 through 5-24.

Through the implementation of these sediment control measures, it is anticipated that sediment yield from disturbed areas in the proposed Coal Hollow Mine permit area will be minimized.

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Impacts to important water quality parameters

As discussed above, appreciable quantities of groundwater are not anticipated to be intercepted in the Tropic Shale overlying proposed mining areas. Consequently, discharge of Tropic Shale groundwaters from mining areas is not anticipated. Because of the very low hydraulic conductivity of the marine Tropic Shale unit which immediately overlies the coal in proposed mining areas, the lateral migration of appreciable amounts of groundwater outward from proposed mine pit areas is not anticipated. Therefore, no impacts to important water quality parameters in surrounding groundwater and surface-water resources that could result from the interception of Tropic Shale groundwaters are anticipated.

Similarly, appreciable quantities of groundwater are not expected to emanate from the Dakota Formation in the mine floor into the mine openings. This conclusion is based on

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the fact that 1) vertical and horizontal groundwater flow in the Dakota Formation is impeded by the presence of low-permeability shales that encase the interbedded lenticular sandstone strata in the formation (i.e., the formation is not a good aquifer), 2) appreciable natural discharge from the Dakota Formation in the surrounding area to springs or streams is not observed, supporting the conclusion that the natural flux of groundwater through the formation is meager, and 3) mining will commence near the truncated up-dip end of the formation, minimizing the potential for elevated hydraulic head in the Dakota Formation. The results of slug testing performed on wells screened in the Smirl coal seam indicate relatively low values of hydraulic conductivity for the coal seam (Table 7-8). In much of the proposed mining area, the coal seam is dry. Thus, large inflows of groundwater from the coal seam into mine workings are not anticipated. Likewise, the potential for seepage out of mine pits through the coal seam is minimal. Consequently, impacts to important water-quality parameters in the Dakota Formation potentially resulting from mining operations are not anticipated, nor are impacts to important water-quality parameters in surrounding groundwater and surface-water systems anticipated as a result of interactions with intercepted Dakota Formation groundwater.

The water quality of groundwaters in the alluvial groundwater system up-gradient of mining operations will likely not be impacted by mining and reclamation activities in the proposed Coal Hollow Mine. Were alluvial groundwaters intercepted by mine openings allowed to flow into the mine pits, there would be the potential for substantially increased TDS concentrations as the water interacts with the marine Tropic Shale and the Smirl coal seam. This occurrence will be avoided.

As groundwater naturally migrates through the shallow, fine-grained alluvial sediments in the proposed Coal Hollow Mine permit and adjacent area (most evident in Sink Valley), the quality of the water is naturally degraded (see Appendix 7-1). In the distal portions of Sink Valley, most notably concentrations of magnesium, sulfate, and bicarbonate are elevated in the alluvial groundwater.

The potential for TDS increases associated with interaction of waters with the Tropic Shale can be minimized by avoiding contact where practical between water sources and earth materials containing soluble minerals. Where possible, groundwater that will be encountered in alluvial sediments along the margins of mine pit areas will be routed through pipes, ditches or other conveyance methods away from mining areas via gravity drainage so as to prevent or minimize the potential for interaction with sediments disturbed by mining operations (including contact with the mined coal seam). If diverted alluvial groundwater were allowed to interact extensively with the Tropic Shale bedrock or Tropic Shale-derived alluvial sediments, similar increases in magnesium, sulfate, bicarbonate, and TDS concentrations would be anticipated. Consequently, where intercepted groundwaters will be routed around disturbed areas through pipes or well-constructed and maintained ditches, it is anticipated that detrimental impacts to important water quality parameters in these waters will be minimal.

The pumping and discharging of mine water from mine pits at the proposed Coal Hollow Mine permit area is not anticipated. The impoundment of substantial quantities of water

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within the mine pits would likely result in degradation of groundwater quality and is also not compatible with the proposed surface mining technique (the coal extraction operations occur at the bottom of the mine pit and thus they cannot be performed in flooded mine pits). As discussed above, the only likely foreseeable source of appreciable quantities of groundwater is from the alluvial groundwater systems overlying the low-permeability Tropic Shale in proposed mining areas. Where this alluvial groundwater is encountered in mining areas, it will be diverted away from mine workings prior to significant interaction with sediments in disturbed areas. Any discharge from the mine pits that does occur will be regulated under a Utah UPDES discharge permit.

Acid mine drainage is not anticipated at the proposed Coal Hollow Mine permit area. This is due primarily to the relatively low sulfur content of the coal (see Appendix 6-1; confidential binder) and rock strata in the permit and adjacent area, and to the pervasiveness of carbonate minerals in the soil and rock strata which neutralize the acidity of the water if it occurs. If sulfide mineral oxidation and subsequent acid neutralization via carbonate dissolution were to occur, increases in TDS, calcium, magnesium, sulfate, and bicarbonate concentrations (and possibly also sodium concentrations via ion-exchange with calcium or magnesium on exchangeable clays) would be anticipated.

An analysis of the acid/base potential of samples collected from the overburden and underburden in the proposed mining area indicates that acid mine drainage will be unlikely to occur at the Coal Hollow Mine. The results of laboratory analysis of the acid/base potential of samples collected from the overburden, underburden, and Smirl coal zone are presented in Appendix 6-2. None of the overburden or underburden samples were acid forming, as each of the intervals sampled showed excess neutralization potential. Taken as a whole, the un-weighted composite average acid/base potential of the 57 overburden and underburden samples indicates a net neutralization potential of 174 tons per kiloton. The neutralization potential of the composite overburden/underburden (180 tons per kiloton) exceeds the acid potential (5.5 tons per kiloton) by more than 32 times. A general consensus opinion mentioned by the National Mine Land Reclamation Center (OSM, 1998) is that if the net acid/base potential exceeds 30 tons per kiloton, and the ratio of neutralization potential to acid potential exceeds two, then *alkaline* water will be generated and acid mine drainage will not occur. The acid/base characteristics of composite overburden and underburden in the Coal Hollow Mine area greatly exceed both of these two criteria, suggesting the strong likelihood that acid mine drainage will not be an issue at the Coal Hollow Mine.

Because of the net neutralization potential of the composite overburden/underburden in the Coal Hollow Mine area described above, the pH values of groundwater in fill areas will likely be neutral to alkaline. Accordingly, the solubility of dissolved trace metal species in the alkaline water will likely be low. Consequently, the potential for the mobilization and transport of trace metals in groundwater in the fill will likely also be low. Concentrations of total selenium, water extractable selenium, water extractable boron and other important chemical species in the overburden samples from the Coal Hollow Mine area are generally low. Water extractable selenium concentrations in the

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analyzed Dakota Formation underburden samples range from 0.05 to 0.2 mg/kg (see Appendix 6-2). Water extractable boron concentrations in the Dakota Formation underburden in a single location (CH-08; 6.5 mg/kg) marginally exceed the Division standard of 5 mg/kg. The limited quantities of material containing water extractable selenium and boron in these concentration ranges in backfill materials are not anticipated to result in appreciably elevated selenium or boron concentrations in groundwater or surface water supplies. Because the hydraulic conductivity of the composite run-of-mine backfill material (which will be rich with clays, silts, and shale) is expected to be low, the flux of groundwater that might migrate through the backfilled pit areas is likely to be low. Additionally, the reclaimed land surface will be graded to promote runoff of surface waters overlying backfilled areas, thus minimizing the potential for infiltration of surface waters into backfilled areas. Consequently, the potential for acid mine drainage or toxic drainage from backfilled areas to surrounding groundwater and surface-water supplies will be minimized.

As outlined in the topsoil and subsoil sampling plan in Chapter 2 of this MRP, materials with poor quality SAR, elevated selenium or boron concentrations, or poor pH as defined by Division guidelines will not be placed in the upper four feet of the reclaimed surface. These materials will also not be placed in the backfill within the top four feet of ephemeral drainages with 100 year flood plains, or in the top four feet in surface water impoundments, or in the top four feet in intermittent or perennial drainages including 100 year flood plains as outlined in the Division guidelines. Materials placed in the top four feet will be sampled to ensure that only suitable materials are placed in the top four feet of the reclaimed surface.

It is noteworthy that in the neighboring state of Wyoming, a water extractable selenium standard of 0.3 mg/kg is considered suitable for topsoil and topsoil substitutes, with concentrations ranging from 0.3 to 0.8 mg/kg being considered marginally suitable for topsoil and topsoil substitute.

As is typical with coal seams regionally, laboratory analyses of coal samples from the Coal Hollow Mine area indicates that there is a net acid forming potential in the coals of the Smirl coal zone (see Appendix 6-2). However, the mining plans call for the mining and removal of 95% of the total coal seam thickness from mining areas, leaving only minor amounts of coal in backfilled areas. Consequently, the potential contribution to the overall acid/base potential of the composite backfill material would be small. Assuming a worst-case-scenario – that all the coal would be retained in the backfill material – the calculated acid/base potential of the composite backfill material is still well within the limits suggested by OSM (1998) to indicate that alkaline discharge without acid mine drainage would be likely.

As described in Chapter 5, Section 532, surface runoff that occurs on disturbed areas will be treated through sedimentation ponds or other sediment-control devices and particulate matter will be allowed to settle prior to the discharging of the water to the receiving water, thus controlling suspended solids concentrations.

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At any mining operation there is the potential for contamination of soils, surface-water and groundwater resources resulting from the spillage of hydrocarbons. Diesel fuels, oils, greases, and other hydrocarbons products will be stored and used at the mine site for a variety of purposes. A spill Prevention Control and Countermeasure Plan will be implemented that will help minimize any potential detrimental impacts to the environments.

Spill control kits will be provided on all mining equipment and personnel will be trained to properly control spills and dispose of any contaminated soils in an appropriate manner.

Based on these findings, it is concluded that the potential for mining and reclamation activities in the proposed Coal Hollow Mine permit area to cause detrimental impacts to important water quality parameters is minimal.

728.333 Flooding or streamflow alteration

As described above, appreciable groundwater inflow from the Tropic Shale and Dakota Formation into mine pits at the proposed Coal Hollow Mine are not anticipated. Appreciable groundwater inflows are anticipated only from the relatively thin, overlying alluvial groundwater systems. The thicknesses of the alluvium adjacent to mine openings in the proposed mining areas is generally less than 40 to 50 feet. The hydraulic conductivities of the predominantly clayey and silty alluvial sediments are low, and consequently, very large or sudden groundwater inflows into mine openings are not anticipated. Where appreciable alluvial groundwater is encountered adjacent to mine openings, it will be routed away from mining areas through ditches of other conveyance mechanisms. Consequently, discharge of mine water from the mine pits is not anticipated. The rates of alluvial groundwater drainage that could occur will likely not be of a magnitude that could potentially cause flooding or streamflow alteration in either the Sink Valley Wash or Lower Robinson Creek drainages.

If excess groundwater were to be encountered during mining operations such that it could not be adequately managed or discharged in compliance with the Utah UPDES discharge permit (which is considered unlikely), Alton Coal Development, LLC may when necessary construct supplemental containment and settlement ponds in which mine discharge waters may be held for treatment (where necessary) and subsequent discharge through UPDES discharge points in compliance with the UPDES discharge permit, minimizing the potential for flooding or streamflow alteration in areas adjacent to mining. To ensure that the mine is able to deal with any unforeseen

When coal mining near the eastern edge of the Coal Hollow Mine permit area occurs (mine pits 13-15), special measures will be taken to minimize the potential for the interception by the mine openings of large quantities of groundwater from artesian groundwater system in the northwest ¼ of Section 29, T5W, R39S, and to adequately

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deal with groundwater inflows if such occur. Details of the contingency plan for this occurrence are provided in Appendix 7-9.

When mining operations advance toward the eastern edge of the permit boundary in pit 15, material excavating in the alluvial sediments will be performed incrementally and with caution. As excavation proceeds, if coarse, water-bearing alluvial sediments (gravels) are encountered, overburden removal in that area will be stopped. The excavation equipment operator will recover the exposed gravel zone with local impermeable sediments (abundant in the alluvium in the area) to halt groundwater inflow if possible. The hydrogeologist will be called to the site to assess the hydrogeologic conditions. An investigation of the situation will be performed and a suitable work plan will be developed prior to the resumption of overburden removal in that area. The work plan will be designed to minimize the potential for intercepting unacceptably large inflows of groundwater into the mine pits. The work plan will most likely involve trenching in the alluvium in zones up-gradient of the mine pit area and the emplacement of a low-permeability cut-off wall. The cut-off wall would be emplaced in the excavated trench using acceptable native low-permeability materials. The cut-off wall would be designed to isolate the mine openings from the coarse-grained alluvial groundwater system sufficient to decrease mine inflows to acceptable levels (i.e. so as to minimize the potential for detrimental impacts to the hydrologic balance and to minimize the potential for flooding of mine pits or causing flooding or stream alteration).

As a temporary measure to manage any potential large groundwater inflows that may occur in these areas prior to the installation of a suitable up-gradient hydraulic barrier, the intercepted alluvial groundwaters would be routed along mine benches that "daylight" to the natural land surface in areas to the south. The water would be diverted into pond 4 which has an appreciable storage capacity and discharge structure.

It should be noted that the interception of moderate amounts of groundwater from shallow alluvial groundwater systems in these areas is considered likely. Modest inflows of shallow groundwater intercepted by the mine workings in these areas would be manageable and not of significant concern. The objective of the work plan would be to ensure that strong hydrodynamic communication between the coarse-grained artesian alluvial groundwater systems in the eastern portion of Sink Valley with the Coal Hollow Mine workings is not established.

To prevent the migration of alluvial groundwater from the coarse-grained alluvial groundwater system centered east of the mine permit area into mine pit backfill areas after the completion of mining, a permanent low-permeability barrier will be constructed along the eastern edge of the pit 15 area. Details of this plan are provided in Appendix 7-10.

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The rate at which alluvial groundwater will be intercepted by the proposed Coal Hollow Mine will be variable by location and time in permit area. Because of the heterogeneity inherent in most alluvial deposits, the quantifying of precise aquifer parameters in the various mining areas is not straightforward. Additionally, the geometry of the mine openings including the horizontal lengths and heights of mine pit faces adjacent to saturated groundwater systems that are exposed at any point in time are dynamic variables in the surface mining environment. Consequently, precise quantifications of mine groundwater interception rates are not readily obtainable. However, using the estimated mine pit groundwater inflow rates presented as discharge per linear foot of open pit in Table 7-9, it is considered likely that mine interception will be on the order of a few tens of gallons per minute in dry areas and at times when open pit sizes are small, to several hundred gallons per minute in wetter areas and at times when the open pit size is large. It is important to note that inflows into individual pit areas will be short lived, as the individual pits will commonly remain open for a few weeks to a few months.

The reasonably foreseeable maximum quantity of water that could be intercepted by the Coal Hollow Mine is largely a function of the manner in which coal mining operations are conducted in areas where the potential for encountering appreciable groundwater inflows is greatest. If large areas of water-bearing coarse-grained sediments were to be rapidly exposed in mine pit areas, large quantities of water would be anticipated (likely several thousands of gallons per minute). However, as described above, mining operations will be carried out in these areas using the special mining protocols described above. Consequently, large cross-sectional exposures of water-bearing coarse-grained alluvial sediments will not be allowed to be exposed to the mine pits and large inflows of groundwater on that magnitude are not anticipated.

In the unanticipated event that excessive quantities of water were to flow into the mine pits by any mechanism, the water would be pumped from the pits using a suitable pump and piping equipment that will be located on-site at the Coal Hollow Mine for such a contingency. Such water would be managed appropriately as required by all applicable State and Federal regulations. It should be noted that it is not in the mine's interest to allow excessive water to flow into the mine pits. All reasonable efforts will be taken to minimize the potential for flooding of the mine pits (an event that is not considered reasonably foreseeable or probable to occur).

Through the implementation of the above described mining protocols in areas where potentially large groundwater inflows could reasonably be anticipated to occur, the potential for the interception of large quantities of water by the mine is minimized. Consequently, the potential for flooding or streamflow alteration that could occur as a result of intercepting and discharging large quantities of water will be minimized and is considered unlikely.

The principal surface-water drainages in and adjacent to the proposed Coal Hollow Mine permit area are in many locations not stable in their current configurations (see photograph section). Currently, these stream drainages are actively eroding their channels during precipitation events, resulting in down-cutting and entrenchment of

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stream channels, the formation of unstable near-vertical erosional escarpments adjacent to stream channels (which occasionally spill off into the stream channel), aggressive headward erosion of stream channels and side tributaries, and the transport of large quantities of sediment associated with torrential precipitation events. These processes are currently actively ongoing in the proposed permit and adjacent area and the upper extents of these erosional processes are in many locations migrating upward in stream channels, resulting in increasing lengths of unstable stream channels.

Hereford (2002) suggests that the valley fill alluviation in the southern Colorado Plateau occurred during a long-term decrease in the frequency of large, destructive floods, which ended in about 1880 with the beginning of the historic arroyo cutting. Hereford (2002) further suggests that the shift from deposition to valley entrenchment coincided with the beginning of an episode of the largest floods in the preceding 400-500 years, which was probably caused by an increased recurrence and intensity of flood-producing El Nino Southern Oscillation events beginning at ca. A.D. 1870.

The exact causes of the entrenchment of stream channels and the creation of the numerous arroyos currently in existence in the southwestern United States are not completely understood. Vogt (2008) suggests that three primary factors resulted in the arroyo formation. These factors included 1) changes in climate that produced heavy rainfall, 2) land-use practices such as livestock grazing, and 3) natural cycles of erosion and deposition caused by internal adjustments to the channel system. The temporal coincidence of the causes may have magnified the effect of each factor.

Each of these factors likely contributed to the formation of the entrenched stream drainages and arroyos in the Coal Hollow Project area. Gregory (1917) states that historical evidence indicates that the cutting of Kanab Creek began when a large storm occurred on 29 July 1883, and that unusually large amounts of precipitation were received in 1884-85. In this period the Kanab Creek channel was down-cut by 60 feet and widened by 70 feet for a distance of about 15 miles. The lowering of Kanab Creek may have resulted in a lowering of the local base level and consequent incision of both Sink Valley Wash and Lower Robinson Creek. As suggested by Vogt (2008), other factors, such as the heavy livestock grazing in the local area, which was occurring contemporaneously with the heavy thunderstorm events, likely also contributed to the overall conditions that brought about the stream down-cutting episode in the late 1800s.

While the precise sequence of events and conditions that triggered the arroyo formation and stream entrenchment in the principle surface drainages in and adjacent to the Coal Hollow Project area is not known, it is readily apparent that the principle surface water drainages are not currently in a condition of equilibrium. Stream head-cutting (headward erosion), bank erosion, and spalling of the steep stream channel walls are ongoing processes in the Coal Hollow Project area.

The mining and reclamation plan for the Coal Hollow Mine has been designed to minimize the potential for sediment yield and erosion in the mine permit area. Accordingly, the mining and reclamation plan minimizes the potential for stream channel

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erosion and instability within the permit area. No mining-related activities are planned that would likely result in a worsening of the current instability of the surface water drainages in the permit and adjacent area.

The Coal Hollow Mine mining and reclamation plan calls for reclamation activities concurrent with mining progression, which results in the smallest disturbed area footprint and minimizes the length of time that the land surface is susceptible to erosion. The plan also calls for soil tackifiers to be used as a temporary soil stabilizer on reclamation areas prior to seeding. Seeded areas will be mulched. Vegetation established in final reclamation areas will minimize the potential for sediment yield and stream erosion in the long term.

The potential for erosion on the planned excess spoils pile will likewise be minimized. The design plans for the excess spoils pile call for the side slopes exceeding 60 feet in height to be constructed with concave slopes to promote slope stability and to minimize the erosion potential. The excess spoils pile will also be revegetated to minimize the erosion potential.

The Lower Robinson Creek reconstruction will likewise be constructed to promote stability and resistance to erosion. Details of the Lower Robinson Creek reconstruction are shown on Drawings 5-20A and 5-21A. The construction of the channel will include riprap of the channel bottom and the inclusion of an inner flood plane to minimize erosion during flooding events. The stream channel will be revegetated to minimize erosion potential. The Lower Robinson Creek reconstruction is designed to leave the drainage in a condition at final bond release that is at least as stable as the current pre-mining condition.

Following reclamation, stream channels will be returned to a stable state to the extent possible given the currently unstable state of natural drainage channels in the area. Stream channels will be designed to withstand anticipated storm events, thus minimizing the potential of flooding in the reclaimed areas.

The overall condition of the land surface and the surface-water drainages within the permit area at final bond release will likely meet or exceed the current pre-mining conditions. However, it should be noted that Alton Coal Development, LLC will have no control over the land management practices and landowner activities that may be implemented on the privately owned lands of the reclaimed Coal Hollow Mine area after final bond release. Accordingly, the degree of erosional stability and overall conditions in the reclaimed lands and stream drainages in the post bond-release period is not in the control of Alton Coal Development, LLC.

The existing principle surface-water drainages adjacent to the proposed Coal Hollow Mine permit area have large discharge capacities (lower Sink Valley Wash below the County Road 136 crossing, Lower Robinson Creek, and Kanab Creek). These drainages periodically convey large amounts of precipitation runoff water associated with torrential precipitation events. The anticipated discharge rates from alluvial groundwater drainage

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and the maximum reasonably foreseeable amount of mine discharge water that could potentially be required to be discharged from mine pits is much less than that periodically occurring during major torrential precipitation events. The addition of modest amounts of sediment-free water into these stream channels has the potential to cause minor increases in channel erosion. However, the magnitude of this potential impact will likely be small relative to that occurring during torrential precipitation events.

Most precipitation waters falling on disturbed areas will be contained in diversion ditches and routed to sediment impoundments that are designed to impound seasonal water and storms. Sediment control facilities will be designed and constructed to be geotechnically stable. This will minimize the potential for breaches of sediment control structures, which if they occur could result in down-stream flooding and increases in stream erosion and sediment yield. Emergency spillways will be part of the impoundment structures to provide a non-destructive discharge route should capacities ever be exceeded.

Details associated with these structures can be viewed on Drawings 5-25 through 5-34 and Appendix 5-2.

It should be noted that during the startup and construction phase of the mine operation, while the ditches and sediment control ponds are being constructed, temporary silt control measures will be utilized. These measures may include the use of silt fences or other appropriate sediment control measures as necessary.

As shown on Drawing 5-26, there are two sediment impound watershed areas within the mine permit area (Watershed 5 and Watershed 6) from which precipitation runoff water will not be routed through sediment ponds.

Watershed 5 area includes 28 acres near the Sink Valley Wash/Lower Robinson Creek drainage divide. The land surface in Watershed 5 is relatively flat, sloping at about a one percent grade. Because of the flatness of the land surface in Watershed 5, it is not practical to construct ditches to convey water from this area to a sediment pond. Consequently, control of sediment in runoff water from Watershed 5 will be accomplished through the use of a silt fence or other appropriate sediment control measure placed along the western permit boundary adjacent to Watershed 5 (see Drawing 5-26). Precipitation water falling on Watershed 5 will be retained as soil moisture, retained in the lowest portions of the watershed and allowed to evaporate or infiltrate or, after treatment with silt fences or other appropriate sediment control measures, allowed to flow down gradient onto lower lying adjacent areas.

Watershed 6 includes 19 acres located within the permit boundary east of the proposed Lower Robinson Creek reconstruction (see Drawing 5-26). The land surface in this area slopes gently toward the west at an approximately three to four percent grade. The Watershed 6 area will be isolated from a sediment pond by the reconstructed Lower Robinson Creek stream channel. Control of sediment in Watershed 6 will be accomplished through the installation of a silt fence or other appropriate sediment control measure along the margin of the watershed as shown on Drawing 5-26. The soils on the

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post-mining land surface in Watershed 6 will initially be stabilized with the use of tackifiers. Subsequent revegetation of the land surface in Watershed 6 will minimize the potential for erosion. After treatment with silt fences or other appropriate sediment control measures, precipitation water falling on Watershed 6 will be allowed to flow down-gradient toward adjacent lands or toward the Lower Robinson Creek stream channel.

The potential for flooding or streamflow alteration resulting from mining and reclamation activities at the proposed Coal Hollow Mine permit area is considered minimal.

728.334 Groundwater and surface water availability

Groundwater use in the proposed Coal Hollow Mine permit and adjacent area is generally limited to stock watering and domestic use in Sink Valley. Some limited use of spring discharge water for irrigation has occurred in Sink Valley, although such irrigation is not occurring presently nor has it occurred in at least the past 10 years. The areas of groundwater use in the proposed Coal Hollow Mine permit and adjacent area are located in the northwest $\frac{1}{4}$ of Section 29, T39S, R5W (see Drawing 7-4; groundwater discharge area A), and in the northwest $\frac{1}{4}$ of Section 32, T39S, R5W (see Drawing 7-4; groundwater discharge area B). The likely future availability of groundwater in each of these areas is discussed below.

Groundwater discharge area A (Northwest $\frac{1}{4}$, Section 29, T39S, R5W)

Groundwater use in area A occurs from several alluvial springs and seeps that are used for stock watering and limited domestic use. As described in Section 728.311 above, short-term diminution in discharge rates from springs in northwest $\frac{1}{4}$ of Section 29, T39S, R5W are possible as mining operations advance toward these springs. This potential impact is associated with the possible drainage of up-gradient alluvial groundwater into mine openings as mining advances toward groundwater discharge area A. Because individual mine pits will typically remain open for less than about 60 to 120 days (measured from the time the mining of the pit is completed to the time the pit is backfilled) before subsequently being backfilled and reclaimed, the potential for long-term drainage of alluvial groundwater into the mine voids is negligible, and thus any potential decreases in alluvial discharge in groundwater discharge area A is anticipated to be short-lived.

If groundwater inflow rates into mine openings in this area are excessive, such that appreciable impacts to the springs and seeps in groundwater discharge area A are likely, where necessary Alton Coal Development, LLC will use a suitable technique to minimize groundwater inflow rates into the mine voids. These techniques may include the use of bentonite or natural clay filled cutoff walls or other means where appropriate to isolate

and protect groundwater resources up-gradient of mining activities. Consequently, the potential that groundwater could become unavailable in this area is minimal. Additionally, if alluvial groundwater resources were to become unavailable in this area due to mining and reclamation activities in the proposed Coal Hollow Mine permit area, groundwater will be replaced according to all applicable State laws and regulations using the replacement water source described in Section 727 above. Details of the contingency plan for this occurrence are provided in Appendix 7-9.

To prevent the migration of alluvial groundwater from the coarse-grained alluvial groundwater system centered east of the mine permit area into mine pit backfill areas after the completion of mining, a permanent low-permeability barrier will be constructed along the eastern edge of the pit 15 area. Details of this plan are provided in Appendix 7-10.

It should be noted that the proposed water replacement source is a new well that will produce groundwater from the coarse-grained alluvial groundwater system in Sink Valley. Nearby springs that could potentially be impacted by mining and reclamation activities are supported by the same alluvial groundwater system. However, while modest decreases in the artesian hydraulic pressures in the alluvial groundwater system could potentially result in diminution of spring flows, the new well will be equipped with an electric well pump providing the capability to produce groundwater from the alluvial system even if the hydraulic head in the alluvial groundwater system were to be diminished such that artesian flow conditions temporarily ceased to exist.

Groundwater discharge area B (Northwest ¼, Section 32, T39S, R5W)

Groundwater use in groundwater discharge area B occurs at alluvial springs and seeps located southeast of the proposed Coal Hollow Mine permit area that are used for stock watering and limited domestic use. As described in Section 728.311 above, although some temporary and short-lived diminution in discharge rates from springs in northwest ¼ of Section 29, T39S, R5W is possible, this potential impact is not considered likely.

In the event that alluvial groundwater resources were to become unavailable in this area due to mining and reclamation activities in the proposed Coal Hollow Mine permit area, groundwater will be replaced according to all applicable State laws and regulations using the replacement water source described in Section 727 above.

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Surface-water availability

Surface-water use in the proposed Coal Hollow Mine permit and adjacent area occurs in the Sink Valley Wash drainage and in Lower Robinson Creek. Surface waters in the Sink Valley Wash drainage (primarily from Water Canyon via an irrigation diversion and from Swapp Hollow; appreciable discharge in Sink Valley Wash below Section 29 T39S, R5W is usually absent) are utilized for both stock watering and limited irrigation use. Stream water in the Sink Valley Wash drainage is derived from runoff from the adjacent Paunsaugunt Plateau area. Because the surface water in the drainage originates from areas up-gradient areas located large distances from proposed mining areas, and because the stream channel is entirely outside the permit area and will not be impacted by mining and reclamation activities, there is essentially no probability that surface water availability in the Sink Valley Wash drainage could become unavailable as a result of mining and reclamation activities.

Discharge in Lower Robinson Creek immediately above the proposed Coal Hollow Mine permit area typically occurs only in direct response to significant precipitation or snowmelt events. Thus, surface-water availability is currently limited in this drainage prior to any mining activities.

Seepage of alluvial groundwater into the deeply incised lower Robinson Creek stream channel occurs near the contact with the underlying Dakota Formation in the southeast quarter of Section 19, T39S, R5W. This water is likely related to saturated alluvial deposits directly underlying the Robinson Creek stream channel and emerges near where the stream channel intersects the alluvial groundwater system. This seepage of alluvial water is usually about 5 - 10 gpm or less and is routinely monitored at monitoring station SW-5 (Drawing 7-2).

It should be noted that the proposed Coal Hollow Mine plan calls for the permanent diversion of a reach of the Lower Robinson Creek stream channel approximately 2,000 feet in length in the southeast $\frac{1}{4}$ of Section 19, T39S, R5W. Details of the proposed diversion are given in Chapter 5, Section 527.220 of this MRP. If this action results in diminution of the meager discharge of surface water in the drainage below the planned diversion, where required a suitable mitigation for this potential impact will be designed and implemented in consultation with the Division of Oil, Gas and Mining.

The information presented above suggests that the potential for significant impacts to groundwater and surface-water availability resulting from mining and reclamation activities in the proposed Coal Hollow Mine permit and adjacent systems in the region is low.

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Whether mining and reclamation activity will result in contamination, diminution or interruption of State-appropriated waters

State appropriated water rights in the proposed Coal Hollow Mine permit and adjacent area are shown on Drawing 7-3 and tabulated in Appendix 7-3.

Appropriated groundwaters include alluvial springs and seeps in the northwest ¼ of Section 29, T39S, R5W (groundwater discharge area A), springs and seeps in the northwest ¼ of Section 32, T39S, R5W (groundwater discharge area B). State appropriated surface waters include reaches of Sink Valley Wash east of the proposed Coal Hollow Mine permit area, and reaches of Lower Robinson Creek.

The potential for mining and reclamation activities at the proposed Coal Hollow Mine permit area to result in contamination, diminution or interruption of State-appropriated water in the proposed Coal Hollow Permit and adjacent area are described in detail in Sections 728.310, 728.320, 728.332, and 728.334.

With the possible exception of short-term diminution in discharge rates from springs and seeps in the northwest ¼ of Section 29, T39S, R5W, Contamination, diminution, or interruption of State-appropriated waters in the proposed Coal Hollow Mine permit and adjacent area are not anticipated. It should be noted that if groundwater inflow rates into mine openings in this area are excessive, such that appreciable impacts to the springs and seeps in groundwater discharge area A are likely, where necessary Alton Coal Development, LLC will use a suitable technique to minimize groundwater inflow rates into the mine voids. These techniques may include the use of bentonite or natural clay filled cutoff walls or other means where appropriate to isolate and protect groundwater resources up-gradient of mining activities, minimizing the potential for diminution of discharge rates from these springs.

Additionally, it should be noted that the proposed Coal Hollow Mine plan calls for the temporary diversion of a reach of the Lower Robinson Creek stream channel approximately 2,000 feet in length in the southeast ¼ of Section 19, T39S, R5W. Details of the proposed diversion are given in Chapter 5, Section 527.220 of this MRP. If this action results in diminution of the meager discharge of surface water in the drainage below the planned diversion, where required a suitable mitigation for this potential impact will be designed and implemented in consultation with the Division of Oil, Gas and Mining.

In the event that any State appropriated waters were to be contaminated, diminished, or interrupted due to mining and reclamation activities in the proposed Coal Hollow Mine permit area, groundwater will be replaced according to all applicable State laws and regulations using the replacement water source described in Section 727 above.

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Seasonal baseline water monitoring information for all water rights that could be affected by mining in the permit and adjacent area have been submitted electronically to the Division's on-line hydrology database.

731.200 Water Monitoring

This section describes the hydrologic monitoring plan. Locations of surface-water and groundwater monitoring sites are indicated on Drawing 7-10. Hydrologic monitoring protocols, sampling frequencies, and sampling sites are described in Table 7-4. Groundwater and surface-water monitoring locations are listed in Table 7-5. Operational field and laboratory hydrologic monitoring parameters for surface water are listed in Table 7-6, and for groundwater in Table 7-7. The hydrologic monitoring plan during reclamation will be the same as during the operational phase. The hydrologic monitoring parameters have been selected in consultation with the Division's directive Tech-006, *Water Monitoring Programs for Coal Mines*.

The groundwater and surface-water monitoring plan is extensive and includes 54 monitoring sites. The monitoring plan is designed to monitor groundwater and surface-water resources for any potential impacts that could potentially occur as a result of mining and reclamation activities in the proposed Coal Hollow Mine permit and adjacent area. Each of the sampling locations and their monitoring purpose are described below.

Streams

Kanab Creek will be monitored at sites SW-3 (above the permit area), and SW-2 (below the permit area). Lower Robinson Creek will be monitored at sites SW-4 (above the permit area), SW-101 (within the permit area), and SW-5 (below the permit area above the confluence with Kanab Creek). The irrigation water near SW-4 will also be monitored at site RID-1. Swapp Hollow creek will be monitored above the permit area at site SW-8. Sink Valley Wash will be monitored at SW-6 (a small tributary to the wash immediately below the permit area) and at SW-9, located in the main drainage below the permit area. All of these locations, with the exception of RID-1) will be monitored for discharge and water quality parameters specified in Table 7-6 quarterly, when reasonably accessible. Additionally, Lower Robinson Creek will be monitored at site BLM-1, which is near the location of alluvial groundwater emergence in the bottom of the stream channel. BLM-1 and RID-1 will be monitored for discharge and field water quality parameters.

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Springs

Eight springs from alluvial groundwater area A will be monitored including SP-8, SP-14, SP-16, SP-19, SP-20, SP-22, SP-24 and Sorensen Spring. Spring SP-8 is a developed spring in area A that provides culinary water for the Swapp Ranch house. SP-8 will be monitored for discharge and operational laboratory water quality measurements quarterly when reasonably accessible. Springs SP-14, SP-16, SP-19, SP-20, SP-22, SP-24 and Sorensen Spring springs will be monitored for discharge and field water quality measurements quarterly when reasonably accessible.

Springs SP-4 and SP-6, and SP-33, which are located in Sink Valley below the proposed mining area, will also be monitored. SP-6 is an area of diffuse seepage above an earthen impoundment in the wash immediately below the permit area. Spring SP-33 is a developed spring that discharges into a pond below the permit area and provides culinary water to two adjacent cabins. Each of these Springs SP-6 and SP-33 will be monitored for discharge and operational laboratory water quality measurements quarterly when reasonably accessible. SP-4 discharges from a fault/fracture system in the Dakota Formation near the canyon margin in Sink Valley Wash below the permit area. Spring SP-4 will be monitored for discharge and field water quality measurements quarterly when reasonably accessible. Spring SP-3 discharges from pediment alluvium in the upland area above Sink Valley Wash more than a mile from the permit area. It is extremely unlikely that discharge rates or water quality at this spring could be impacted as a result of mining-related activities in the mine permit area. However, this spring will be monitored for discharge and field water quality measurements quarterly, primarily to provide background data from springs in the region.

Wells

Wells Y-98 (Robinson Creek alluvium above the permit area), Y-45 (coal seam well in Swapp Hollow above permit area), Y-102 (flowing alluvial well in alluvial groundwater discharge area A), Y-36 (coal seam well in Sink Valley above the permit area), Y-38 (coal seam well in Sink Valley permit area), Y-61 (alluvial well at the Sorenson Ranch), and C5-130 (new monitoring well in alluvial groundwater discharge A) will be monitored quarterly when reasonable accessible. Well Y-61 will be monitored for groundwater operational laboratory water quality parameters to monitor groundwater quality in alluvial groundwater discharge area A. The other wells will be monitored for water level only.

Additionally, 19 newly constructed monitoring wells constructed in the Sink Valley alluvial groundwater system will be monitored quarterly. These include C2-15, C2-28, C2-40, C3-15, C3-30, C3-40, C4-15, C4-30, C4-50, C7-20, C9-15, C9-25, C9-40, LS-28, LS-60, LS-85, SS-15, SS-30, and SS-75. All of these wells will be monitored quarterly.

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for water level. Additionally, wells LS-85 and SS-30 will be monitored for groundwater operational laboratory water quality measurements.

Additionally two wells in the Lower Robinson Creek alluvium will be monitored for water level and groundwater operational laboratory chemistry. These include UR-70 located above proposed mining locations in the Lower Robinson Creek drainage, and LR-45, located below proposed mining areas adjacent to Lower Robinson Creek. It should be noted that LR-45 is located near a proposed sediment pond impoundment. Consequently, if this well becomes unsuitable for monitoring, an alternate location will be used to monitor the Lower Robinson alluvial groundwater system in this area.

Wells C0-18 and C0-54 are located near the initial proposed mining areas in the Lower Robinson Creek drainage. These will be monitored for water level quarterly.

It should be noted that many of the wells specified for monitoring in this monitoring plan will at some point be destroyed or rendered inoperable as the mine workings precede through the area. These wells will be monitored until such a time as they are destroyed or become inoperable.

Groundwater and surface-water monitoring will continue through the post-mining periods until bond release. The monitoring requirements, including monitoring sites, analytical parameters and the sampling frequency may be modified in the future in consultation with the Division if the data demonstrate that such a modification is warranted.

731.530 State-appropriated water supply

The proposed water replacement well will be used both as a water supply source for the mine and for water replacement if needed. Alton Coal Development, LLC commits to having the water-replacement well (or other appropriate water replacement source as approved by the Division) drilled and developed before beginning overburden removal for Pits 13, 14, and 15.

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Table 7-1 Baseline monitoring station locations and details.

Site	UTM location, Z12, NAD 27	Elevation (approx)	Drainage basin	Geologic Formation	Uses
Springs					
SP-3	4136009	372028	lower Sink Valley Wash	Pediment alluvium	Wildlife, contributes to stream flow
SP-4	4136427	371531	lower Sink Valley Wash	Dakota/fault ?	Stock watering
SP-5	4137820	373080	Sink Valley	Pediment alluvium	None apparent
SP-6	4137977	371717	Sink Valley	Alluvium	Stock watering, wildlife
SP-8	4139231	371861	Sink Valley	Alluvium	Domestic, stock watering, wildlife, irrigation historically
SP-14	4139790	372023	Sink Valley	alluvium	Stock watering, wildlife
SP-15	4139660	371960	Sink Valley	alluvium	Stock watering, wildlife
SP-16	4139656	372035	Sink Valley	alluvium	Stock watering, wildlife
SP-17	4139559	372236	Sink Valley	alluvium	None apparent
SP-18	4139486	372196	Sink Valley	alluvium	None apparent
SP-19	4139384	372256	Sink Valley	alluvium	Stock watering
SP-20	4139325	372014	Sink Valley	alluvium	Stock watering, wildlife, irrigation historically
SP-21	4139289	371980	Sink Valley	alluvium	Wildlife
SP-22	4139423	371863	Sink Valley	alluvium	Wildlife
SP-23	4139382	371838	Sink Valley	alluvium	Wildlife
SP-24	4139356	371822	Sink Valley	alluvium	Wildlife
SP-25	4139322	371798	Sink Valley	alluvium	wildlife
SP-26	4139211	371717	Sink Valley	alluvium	Stock watering, wildlife
SP-27	4137416	371645	Sink Valley	Dakota Formation	None apparent
SP-28	4137718	371896	Sink Valley	alluvium	Wildlife
SP-29	4137853	371885	Sink Valley	alluvium	Wildlife
SP-30	4137787	371852	Sink Valley	alluvium	None apparent
SP-31	4137764	371830	Sink Valley	alluvium	None apparent
SP-32	4137864	371810	Sink Valley	alluvium	Stock watering, wildlife
SP-33	4137543	371788	Sink Valley	alluvium	Domestic, stock watering, wildlife
SP-34	4135632	371512	lower Sink Valley Wash	colluvium/Dakota	None apparent
SP-35	4139747	372051	Sink Valley	alluvium	Drinking water for camper/trailer
SP-36	4139979	371830	Sink Valley	alluvium	None apparent
SP-37	4138266	372316	Sink Valley	alluvium/fracture?	Stock watering, wildlife
Streams					
SW-1	4143476	370429	Kanab Creek	---	---
SW-2	4139065	368782	Kanab Creek	---	---
SW-3	4141433	369896	Kanab Creek	---	---
SW-7	4140667	373803	Swapp Hollow (adjacent)	---	---
SW-8	4138970	373869	Swapp Hollow	---	---
SW-5	4138093	371677	Sink Valley Wash	---	---
SW-9	4135632	371485	Lower Sink Valley Wash	---	---
SW-4	41366	373381	Robinson Creek	---	---
SW-5	4139453	369169	Robinson Creek	---	---

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Site	UTM location, Z12, NAD 27	Elevation (approx)	Drainage basin	Geologic Formation	Uses
SW-101	4140303	371304	Robinson Creek	---	---
RID-1 (irrigation)	4141391	373420	Robinson Creek	---	---
SW-10	4135431	371689	Unnamed trip to Sink Valley	---	---
Lamb Canal	4140670	369678	Kanab Creek	---	---
Wells					
Y-102 (A5)	4139571	371917	Sink Valley	Alluvium	Monitoring well
Y-45	4139436	372942	Swapp Hollow	Coal	Monitoring well
Y-61	4139433	372226	Sink Valley	Alluvium	Monitoring well (pumping)
Y-59	4139375	372321	Sink Valley	Alluvium	Monitoring well
Y-63	4137634	371896	Sink Valley Wash	Alluvium	Monitoring well
Y-36	4139447	372147	Sink Valley	Coal	Monitoring well
Y-38	4138615	371318	Sink Valley	Coal	Monitoring well
Y-98 (A1)	4140999	373288	Robinson Creek	Alluvium	Monitoring well
Y-99 (A2)	4140538	372371	Robinson Creek	Coal	Monitoring well
Alluvial trenches					
SVT-01	4138309	371600	Sink Valley	Alluvium	---
SVT-02	4138512	371543	Sink Valley	Alluvium	---
SVT-03	4138743	371485	Sink Valley	Alluvium	---
SVT-04	4139107	371378	Sink Valley	Alluvium	---
SVT-05	4139189	371594	Sink Valley	Alluvium	---
SVT-06	4139150	371595	Sink Valley	Alluvium	---

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Table 7-2 Monitoring well details.

Well	Date drilled	Screened formation	Collar elevation (feet)	Depth (feet)	Depth to bedrock (feet)	Screened interval From (feet) To (feet)	
C0-18	Jan-07	<i>Lower Robinson alluvium</i>	6864.14	22	—	12	22
C0-54	Jan-07	Dakota Formation above coal	6862.59	54	40	47	54
C1-24	Jan-07	Lower Robinson alluvium	6949.19	26.5	24	16.5	26.5
C2-15	Jan-07	Sink Valley alluvium	6920.28	15	—	5	15
C2-28	Dec-06	Sink Valley alluvium	6919.81	28	—	17	27
C2-40	Dec-06	Sink Valley alluvium	6919.58	40	40	20	40
C3-15	Dec-06	Sink Valley alluvium	6890.41	15	—	5	15
C3-30	Dec-06	Sink Valley alluvium	6890.77	30	—	10	20
C3-40	Dec-06	Sink Valley alluvium	6890.73	40	38	20	40
C4-15	Dec-06	Sink Valley alluvium	6873.92	15	—	5	15
C4-30	Dec-06	Sink Valley alluvium	6873.91	30	—	10	30
C4-50	Dec-06	Sink Valley alluvium	6873.52	50	47	30	50
C5-130	Jan-07	Sink Valley alluvium	6938.92	130	123.5	90	130
C6-15	Jan-07	Lower Robinson alluvium	6897.63	15	11	5	15
C7-10	Jan-07	Sink Valley alluvium	6873.77	10	—	10	15
C7-20	Jan-07	Sink Valley alluvium	6872.89	20	19	15	20
C8-25	Jan-07	Sink Valley alluvium	6859.70	27	20	7	27
C9-15	Jan-07	Sink Valley alluvium	6846.77	15	—	5	15
C9-25	Jan-07	Sink Valley alluvium	6846.36	26	—	16	26
C9-40	Jan-07	Sink Valley alluvium	6846.94	42	39	22	42
SS-15	Jan-07	Lower Sink Valley alluvium	6831.57	15	—	5	15
SS-30	Jan-07	Lower Sink Valley alluvium	6830.47	29	—	19	29
SS-75	Jan-07	Lower Sink Valley alluvium	6832.06	75	75	54	74
UR-70	Jan-07	Upper Robinson alluvium	7005.14	70	62	50	70
LR-29	Jan-07	Dakota Formation (uppermost)	6803.10	29	20	19	29
LR-45	Jan-07	Lower Robinson alluvium	6798.41	42	41.5	21	41
LS-15	Jan-07	Lower Sink Valley alluvium	6810.28	15	—	4	14
LS-28	Jan-07	Lower Sink Valley alluvium	6810.23	28	—	17	27
LS-60	Jan-07	Lower Sink Valley alluvium	6810.35	60	—	39	59
LS-85	Jan-07	Lower Sink Valley alluvium	6810.53	87	—	64	84
Y-36	Dec-79	Smirl coal seam (Dakota Formation)	6956.97	230	155	194	214
Y-38	Nov-79	Smirl coal seam (Dakota Formation)	6860.85	105	50	71	86
Y-45	Aug-80	Smirl coal seam (Dakota Formation)	7043.55	352	40	314	330
Y-59	Dec-80	Sink Valley alluvium	6959.06	110	—	50	110
Y-61	Nov-80	Sink Valley alluvium	6962.10	150	145	112	142

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Well	Date drilled	Screened formation	Collar elevation (feet)	Depth (feet)	Depth to bedrock (feet)	Screened interval From (feet) To (feet)	
Y-63	Nov-80	Lower Sink Valley alluvium	6789.34	51	34	Open hole	Open hole
Y-98 (A1)	Jul-86	Upper Robinson alluvium	7173.50	86	83.5	36.6	86
Y-99 (A2)	Jul-86	Upper Robinson alluvium	7055.54	22	20	5.1	13.2
Y-102 (A4)	Jul-86	Sink Valley alluvium	6950.06	86	84.0	43.7	62.94

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Table 7-5 Hydrologic monitoring locations and protocols for operational and reclamation phase monitoring.

Site	Protocols	Comments
<u>Streams</u>		
BLM-1	A, 2	Lower Robinson Creek adjacent to mined areas
RID-1	A, 2	Irrigation ditch in Robinson Creek
SW-2	A, 1	Kanab Creek below Robinson Creek
SW-3	A, 1	Kanab Creek above permit area
SW-4	A, 1	Lower Robinson Creek above permit area
SW-5	A, 1	Lower Robinson Creek above Kanab Creek
SW-6	A, 1	Sink Valley Wash at permit boundary
SW-8	A, 1	Swapp Hollow Creek above permit area
SW-9	A, 1	Sink Valley Wash below permit area
SW-101	A, 2	Lower Robinson Creek in permit area
<u>Springs</u>		
Sorensen Spring	B, 4	Developed alluvial spring in Sink Valley at Sorensen ranch
SP-3	B, 4	Spring in upland pediment alluvium south of permit area
SP-4	B, 3	Developed spring in Sink Valley Wash 1 mile below permit area
SP-6	B, 3	Seep in Sink Valley below permit area
SP-8	B, 3	Developed alluvial spring in Sink Valley at Dames ranch
SP-14	B, 4	Alluvial spring in Sink Valley
SP-16	B, 4	Alluvial spring in Sink Valley
SP-19	B, 4	Alluvial spring in Sink Valley
SP-20	B, 4	Alluvial spring in Sink Valley
SP-22	B, 4	Alluvial spring in Sink Valley
SP-23	B, 4	Alluvial spring in Sink Valley
SP-33	B, 3	Developed spring in lower Sink Valley alluvium
<u>Wells</u>		
Y-36	C	Coal well in Sink Valley above permit area
Y-38	C	Coal well in Sink Valley in permit area
Y-45	C	Coal seam well in Swapp Hollow above permit area
Y-61	C, 5	Water well in Sink Valley artesian alluvial groundwater system above permit area
Y-63	C	Monitoring well in lower Sink Valley Alluvium below mining areas
Y-98	C	Alluvial well in Robinson Creek above permit area
Y-102	C	Alluvial well in upper Sink Valley in permit area
C0-18	C	Alluvial monitoring well in Lower Robinson Creek drainage
C0-54	C	Monitoring well in Lower Robinson Creek drainage near coal seam
C1-24	C	Alluvial monitoring well in Lower Robinson Creek

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Site	Protocols	Comments
		drainage
C2-15	C	Monitoring well in Sink Valley alluvium
C2-28	C	Monitoring well in Sink Valley alluvium
C2-40	C	Monitoring well in Sink Valley alluvium
C3-15	C	Monitoring well in Sink Valley alluvium
C3-30	C	Monitoring well in Sink Valley alluvium
C3-40	C	Monitoring well in Sink Valley alluvium
C4-15	C	Monitoring well in Sink Valley alluvium
C4-30	C	Monitoring well in Sink Valley alluvium
C4-50	C	Monitoring well in Sink Valley alluvium
C5-130	C	Monitoring well in Sink Valley artesian alluvial groundwater system above permit area
C7-20	C	Monitoring well in Sink Valley alluvium
C9-15	C	Monitoring well in Sink Valley alluvium
C9-25	C	Monitoring well in Sink Valley alluvium
C9-40	C	Monitoring well in Sink Valley alluvium
LR-45	C, 5	Monitoring well in Lower Robinson Creek alluvium below mine area
LS-28	C	Monitoring well in Sink Valley Alluvium below mining areas
LS-60	C	Monitoring well in Sink Valley Alluvium below mining areas
LS-85	C, 5	Monitoring well in artesian Sink Valley Alluvium below mining areas
SS-15	C	Monitoring well in Sink Valley Alluvium below mining areas
SS-30	C, 5	Monitoring well in Sink Valley Alluvium below mining areas
SS-75	C	Monitoring well in burned coal area material
UR-70	C, 5	Monitoring well in Lower Robinson Creek alluvium above mine area

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Table 7-8 Slug testing and pump testing results.

Well	Screened formation	Hydraulic conductivity (cm/sec)	Data source	Method
Sink Valley Alluvium				
<i>Coarse upper-central coarse artesian system</i>				
Y-61	Sink Valley alluvium (artesian system)	6.0×10^{-2}	Utah International	Pump test (Jacob; 1946)
<i>Shallow clayey alluvium</i>				
C2-15	Sink Valley alluvium	1.0×10^{-4}	Petersen	Slug test (Hvorslev; 1951)
C3-15	Sink Valley alluvium	Low ($<10^{-6}$)	Petersen	Slug test (Hvorslev; 1951)
C4-15	Sink Valley alluvium	6.0×10^{-4}	Petersen	Slug test (Hvorslev; 1951)
C7-20	Sink Valley alluvium	8.3×10^{-4}	Petersen	Slug test (Hvorslev; 1951)
C8-25	Sink Valley alluvium	3.8×10^{-7}	Petersen	Slug test (Hvorslev; 1951)
C9-15	Sink Valley alluvium	2.5×10^{-5}	Petersen	Slug test (Hvorslev; 1951)
SS-15	Lower Sink Valley alluvium	Low ($<10^{-6}$)	Petersen	Slug test (Hvorslev; 1951)
<i>Middle and lower Sink Valley sandy, silty, clayey alluvium</i>				
C2-28	Sink Valley alluvium	5.3×10^{-3}	Petersen	Slug test (Hvorslev; 1951)
C2-40	Sink Valley alluvium	1.5×10^{-3}	Petersen	Slug test (Hvorslev; 1951)
C3-30	Sink Valley alluvium	5.8×10^{-4}	Petersen	Slug test (Hvorslev; 1951)
C3-40	Sink Valley alluvium	4.7×10^{-4}	Petersen	Slug test (Hvorslev; 1951)
C4-30	Sink Valley alluvium	9.4×10^{-4}	Petersen	Slug test (Hvorslev; 1951)
C4-50	Sink Valley alluvium	1.5×10^{-4}	Petersen	Slug test (Hvorslev; 1951)
C9-25	Sink Valley alluvium	1.1×10^{-3}	Petersen	Slug test (Hvorslev; 1951)
C9-40	Sink Valley alluvium	9.3×10^{-4}	Petersen	Slug test (Hvorslev; 1951)
SS-30	Lower Sink Valley alluvium	2.1×10^{-5}	Petersen	Slug test (Hvorslev; 1951)
<i>Lower Sink Valley coal burned area</i>				
SS-75	Lower Sink Valley alluvium	High ($>10^{-2}$)	Petersen	Slug test (Hvorslev; 1951)
Robinson Creek drainage alluvium				
<i>Upper Robinson Creek drainage coarse alluvium</i>				
Y-98 (A1)	Upper Robinson alluvium	3.2×10^{-2}	Utah International	Slug test (Bouwer and Rice; 1976)
<i>Lower Robinson Creek drainage clayey alluvium</i>				
C0-18	Lower Robinson alluvium	Low ($<10^{-6}$)	Petersen	Slug test (Hvorslev; 1951)
C1-24	Lower Robinson alluvium	Low ($<10^{-6}$)	Petersen	Slug test (Hvorslev; 1951)
C0-54	Alluvium/Dakota Formation above coal	Low ($<10^{-6}$)	Petersen	Slug test (Hvorslev; 1951)
Smirl Coal Seam				
Y-36	Smirl coal seam (Dakota Formation)	1.0×10^{-6}	Utah International	Slug test (Hvorslev; 1951)
Y-38	Smirl coal seam (Dakota Formation)	6.3×10^{-6}	Utah International	Slug test (Hvorslev; 1951)

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Table 7-9 Estimated rates of groundwater inflows based on drilling and slug testing results.

	Saturated alluvial thickness (feet)	Hydraulic conductivity; Clayey alluvium (cm/sec)	Clayey alluvium thickness (feet)	Hydraulic conductivity; Silty alluvium (cm/sec)	Silty alluvium thickness (feet)	Hydraulic conductivity; Coal burn (cm/sec)	Coarse alluvium thickness (feet)	Hydraulic gradient	Discharge per 100 linear feet over saturated thickness (gpm)
Lower Robinson Creek									
C0 area	34	$< 1 \times 10^{-6}$	34	NA	0	NA	0	0.10	< 1
C1 area	6	$< 1 \times 10^{-6}$	6	NA	0	NA	0	0.10	< 1
Sink Valley									
C2 area	40	1.0×10^{-6}	10	5.3×10^{-3}	30	NA	0	0.10	24
C3 area	38	$< 1 \times 10^{-6}$	10	9.4×10^{-4}	28	NA	0	0.10	1.7
C4 area	47	6.0×10^{-4}	10	9.4×10^{-4}	30	NA	0	0.10	6.0
C6 area	0	NA	0	NA	0	NA	0	0.10	< 1
C7 area	11	8.3×10^{-4}	11	NA	0	NA	0	0.10	1.3
C8 area	13	3.8×10^{-7}	13	NA	0	NA	0	0.10	< 1
C9 area	31	2.5×10^{-5}	10	1.1×10^{-3}	21	NA	0	0.10	3.4
SS area	70	$< 1 \times 10^{-6}$	15	2.1×10^{-5}	40	$> 1 \times 10^{-1}$	15	0.10	> 220

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Table 7-10 Summary Information for wells.

Well ID	Well type	Information in DGM database		Operational Monitoring	Operational water monitoring protocol	Well collar elevation (feet)	Ground elevation at well (feet)	Typical minimum depth to water (feet bgs)		Typical maximum depth to water (feet bgs)		Total well depth (feet below ground surface)		Well screened interval (from-to feet bgs)		Well screened geologic formation	MFP map drawing
		Yes	Yes	Yes	quarterly water level	6864.14	6859.8	5.7	13.8	5.7	13.8	22	22	12	22		
C0-18	monitoring well	Yes	Yes	Yes	quarterly water level	6862.59	6859.8	23.4	50.6	23.4	50.6	54	54	47	54	Lower Robinson alluvium	7-2, 7-10, 7-13
C1-24	monitoring well	Yes	Yes	Yes	quarterly water level	6949.19	6846.3	13.0	17.7	13.0	17.7	26.5	26.5	16.5	26.5	Lower Robinson alluvium	7-2, 7-10, 7-13
C2-15	monitoring well	Yes	Yes	Yes	quarterly water level	6920.28	6818.6	1.3	10.9	1.3	10.9	15	15	5	15	Sink Valley alluvium	7-2, 7-10, 7-13
C2-28	monitoring well	Yes	Yes	Yes	quarterly water level	6919.81	6818.6	1.5	11.0	1.5	11.0	28	27	17	27	Sink Valley alluvium	7-2, 7-10, 7-13
C2-40	monitoring well	Yes	Yes	Yes	quarterly water level	6819.68	6818.6	1.5	11.1	1.5	11.1	40	40	20	40	Sink Valley alluvium	7-2, 7-10, 7-13
C3-15	monitoring well	Yes	Yes	Yes	quarterly water level	6890.41	6889.3	0.2	6.4	0.2	6.4	15	15	5	15	Sink Valley alluvium	7-2, 7-10, 7-13
C3-30	monitoring well	Yes	Yes	Yes	quarterly water level	6890.77	6889.3	-0.3	6.3	-0.3	6.3	30	20	10	20	Sink Valley alluvium	7-2, 7-10, 7-13
C3-40	monitoring well	Yes	Yes	Yes	quarterly water level	6890.73	6889.3	-0.2	6.3	-0.2	6.3	40	40	20	40	Sink Valley alluvium	7-2, 7-10, 7-13
C4-15	monitoring well	Yes	Yes	Yes	quarterly water level	6873.92	6872.3	-0.9	5.8	-0.9	5.8	15	15	5	15	Sink Valley alluvium	7-2, 7-10, 7-13
C4-30	monitoring well	Yes	Yes	Yes	quarterly water level	6873.91	6872.3	-0.2	5.3	-0.2	5.3	30	30	10	30	Sink Valley alluvium	7-2, 7-10, 7-13
C4-50	monitoring well	Yes	Yes	Yes	quarterly water level	6873.92	6872.3	-0.6	4.8	-0.6	4.8	50	50	30	50	Sink Valley alluvium	7-2, 7-10, 7-13
C5-130	monitoring well	Yes	Yes	Yes	quarterly water level	6938.92	6836.8	-35.4	-21.0	-35.4	-21.0	130	130	90	130	Sink Valley alluvium	7-2, 7-10, 7-13
C6-15	monitoring well	Yes	No	No	---	6897.63	6895.8	Dry	Dry	Dry	Dry	15	15	5	15	Lower Robinson alluvium	7-2, 7-13
C7-20	monitoring well	Yes	Yes	Yes	quarterly water level	6872.89	6870.2	5.4	9.1	5.4	9.1	20	20	15	20	Sink Valley alluvium	7-2, 7-10, 7-13
C8-25	monitoring well	Yes	No	No	---	6859.70	6857.0	5.1	8.0	5.1	8.0	27	27	7	27	Sink Valley alluvium	7-2, 7-13
C9-15	monitoring well	Yes	Yes	Yes	quarterly water level	6846.77	6844.7	0.4	10.2	0.4	10.2	15	15	5	15	Sink Valley alluvium	7-2, 7-10, 7-13
C9-25	monitoring well	Yes	Yes	Yes	quarterly water level	6846.36	6844.7	0.8	10.4	0.8	10.4	26	26	16	26	Sink Valley alluvium	7-2, 7-10, 7-13
C9-40	monitoring well	Yes	Yes	Yes	quarterly water level	6846.94	6844.7	1.3	10.4	1.3	10.4	42	42	22	42	Sink Valley alluvium	7-2, 7-10, 7-13
SS-15	monitoring well	Yes	Yes	Yes	quarterly water level	6831.57	6830.0	-0.1	6.2	-0.1	6.2	15	15	5	15	Lower Sink Valley alluvium	7-2, 7-10, 7-13
SS-30	monitoring well	Yes	Yes	Yes	quarterly water level, lab water quality	6830.47	6830.0	-0.3	6.1	-0.3	6.1	29	29	18	29	Lower Sink Valley alluvium	7-2, 7-10, 7-13
SS-75	monitoring well	Yes	Yes	Yes	quarterly water level	6832.06	6830.0	10.7	13.0	10.7	13.0	75	74	54	74	Lower Sink Valley alluvium	7-2, 7-10, 7-13
UR-70	monitoring well	Yes	Yes	Yes	quarterly water level, lab water quality	7005.14	7003.2	19.5	21.3	19.5	21.3	70	70	50	70	Upper Robinson alluvium	7-2, 7-10, 7-13
UR-29	monitoring well	Yes	No	No	---	6803.10	6801.1	23.0	Dry	23.0	Dry	29	29	19	29	Dakota Formation (uppermost)	7-2, 7-10, 7-13
LR-45	monitoring well	Yes	Yes	Yes	quarterly water level, lab water quality	6798.41	6796.7	28.6	26.1	28.6	26.1	42	41	21	41	Lower Robinson alluvium	7-2, 7-10, 7-13
LS-28	monitoring well	Yes	Yes	Yes	quarterly water level, lab water quality	6810.23	6808.9	0.4	7.5	0.4	7.5	28	27	17	27	Lower Sink Valley alluvium	7-2, 7-10, 7-13
LS-60	monitoring well	Yes	Yes	Yes	quarterly water level	6810.35	6808.9	-0.6	5.0	-0.6	5.0	60	39	39	59	Lower Sink Valley alluvium	7-2, 7-10, 7-13
LS-85	monitoring well	Yes	Yes	Yes	quarterly water level, lab water quality	6810.53	6808.9	-8.6	-2.6	-8.6	-2.6	87	84	64	84	Lower Sink Valley alluvium	7-2, 7-10, 7-13
Y-36	monitoring well	Yes	Yes	Yes	quarterly water level	6956.97	6953.6	79.7	81.0	79.7	81.0	230	214	194	214	Smrit coal seam (Dakota Fm)	7-2, 7-10, 7-13
Y-38	monitoring well	Yes	Yes	Yes	quarterly water level	6860.85	6857.6	50.2	51.1	50.2	51.1	105	71	86	86	Smrit coal seam (Dakota Fm)	7-2, 7-10, 7-13
Y-45	monitoring well	Yes	Yes	Yes	quarterly water level	7043.55	7041.8	247.6	248.4	247.6	248.4	352	330	314	330	Smrit coal seam (Dakota Fm)	7-2, 7-10, 7-13
Y-59	monitoring well	Yes	No	No	---	6959.06	6956.8	-22.8	-20.3	-22.8	-20.3	110	110	50	110	Sink Valley alluvium	7-2, 7-13
Y-81	mon well 9-inch	Yes	Yes	Yes	quarterly water level, lab water quality	6962.10	6959.3	-15.3	-13.8	-15.3	-13.8	150	142	112	142	Sink Valley alluvium	7-2, 7-10, 7-13
Y-83	monitoring well	Yes	Yes	Yes	quarterly water level, lab water quality	6789.34	6786.5	7.1	12.2	7.1	12.2	51	51	36.6	86	Lower Sink Valley alluvium	7-2, 7-10, 7-13
Y-88 (A1)	monitoring well	Yes	Yes	Yes	quarterly water level	7173.50	7170.8	76.2	82.5	76.2	82.5	86	86	5.1	13.2	Upper Robinson alluvium	7-2, 7-10, 7-13
Y-88 (A2)	monitoring well	Yes	No	No	---	7055.54	7052.5	Dry	Dry	Dry	Dry	22	22	5.1	13.2	Upper Robinson alluvium	7-2, 7-13
Y-102 (A4)	monitoring well	Yes	Yes	Yes	quarterly water level	6950.06	6948.1	-11.5	-8.4	-11.5	-8.4	86	84.7	43.7	82.84	Sink Valley alluvium	7-2, 7-10, 7-13

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Table 7-11 Summary information for springs and seeps.

Spring	Operational Monitoring	Operational monitoring protocol	Water Right (See Appendix 7-1 and Drawing 7-3)	Ownership	Average Flow Range	Well shown on MRP map drawing
SP-3	Yes	Field Only	---	---	6 to 8 gpm	7-1, 7-2, 7-10
SP-4	Yes	Field and Chem	---	---	0.5 to 1 gpm	7-1, 7-2, 7-10
SP-5	No	---	---	---	Damp	7-1, 7-2
SP-8	Yes	Field and Chem	85-375	Darlynn & Arlene Sorensen	Seepage, <1 gpm	7-1, 7-2, 7-10
SP-8	Yes	Field and Chem	85-353	Richard L & Alecia S. Dame	9 to 20 gpm	7-1, 7-2, 7-10
SP-14	Yes	Field and Chem	85-214	C. Burton Pugh	4 to 7 gpm	7-1, 7-2, 7-10
SP-15	No	---	---	---	0.2 to 1.3 gpm	7-1
SP-16	Yes	Field Only	85-350	Richard L & Alecia S. Dame	0.35 to 1.5 gpm	7-1, 7-2, 7-10
SP-17	No	---	---	---	Seep	7-1
SP-18	No	---	---	---	Seep	7-1
SP-19	No	---	85-374	Darlynn & Arlene Sorensen	Seep to 0.33 gpm	7-1, 7-2
SP-20	Yes	Field and Chem	85-351	Richard L & Alecia S. Dame	6 to 10.5 gpm	7-1, 7-2, 7-10
SP-21	No	---	---	---	1 gpm	7-1
SP-22	Yes	Field Only	85-352	Richard L & Alecia S. Dame	Seep to 0.4 gpm	7-1, 7-10
SP-22a	No	---	---	---	Seep	7-1
SP-23	Yes	Field Only	85-215	C. Burton Pugh	Seep to 1.2 gpm	7-1, 7-10
SP-24	No	---	---	---	Seep to 0.25	7-1
SP-25	No	---	---	---	Seep to 0.5 gpm	7-1
SP-26	No	---	---	---	Seep to 1.5 gpm	7-1
SP-27	No	---	---	---	Seep to 0.5 gpm	7-1
SP-28	No	---	---	---	Dry to seep	7-1
SP-29	No	---	---	---	Dry to seep	7-1
SP-30	No	---	---	---	Dry to seep	7-1
SP-31	No	---	---	---	Dry to seep	7-1
SP-32	No	---	---	---	Dry to 0.33 gpm	7-1
SP-33	Yes	Field and Chem	85,355, 85-1011	James, Julie & Lloyd Johnson	3 to 14 gpm ^a	7-1, 7-2, 7-10
SP-34	No	---	---	---	Dry to seep	7-1
SP-35	No	---	---	---	Seep to 0.2 gpm	7-1
SP-36	No	---	---	---	Dry to 5 gpm	7-1
SP-37	No	---	---	---	Seep to 0.1 gpm	7-1
SP-38	No	---	---	---	Seep	7-1
SP-39	No	---	---	---	Damp	7-1
SP-40 (Sorensen Spring)	Yes	Field Only	85-373	Darlynn & Arlene Sorensen	Seep to 0.33 gpm	7-1, 7-2, 7-10

^a These springs are located outside the permit and adjacent area and water rights information has not been provided.

^b During March of 2008 during a period of active snowmelt a discharge of 119 gpm was measured

Table 7-12 Water rights details and status.

WR#	Water Right Type	Water Right Amount	Typical Flow Range (gpm)	Status	Potential Impact Mechanism (yes/no)	ACD Monitoring Number (s)	Appendix 7-3 ID	OWNER	SOURCE
Stream Reaches									
85-182	Stockwatering (point to point)	Not given	110-2700	Diligence Claim/Proposed Determination	No	SW-2, SW-3	SR-1	Gam L. Swapp	Kanab Creek
85-303	Stockwatering (point to point)	Not given	110-2700	Diligence Claim/Proposed Determination	No	SW-2, SW-3	SR-2	Sharon C. & Lorene C. Lamb	Kanab Creek
85-308	Stockwatering (point to point)	Not given	0-734	Diligence Claim/Proposed Determination	No	SW-4, SW-101	SR-3	Lloyd, Rosa, gall & Vard Heaton	Lower Robinson Creek
85-463	Stockwatering (point to point)	Not given		Diligence Claim/Proposed Determination	No	SW-4, SW-101	SR-4	BLM	Lower Robinson Creek
85-309	Stockwatering (point to point)	Not given		Diligence Claim/Proposed Determination	No	SW-4, SW-101	SR-5	C. Burton Pugh	Lower Robinson Creek
85-210	Stockwatering (point to point)	Not given		Diligence Claim/Proposed Determination	No	SW-4, SW-101	SR-6	C. Burton Pugh	Lower Robinson Creek
85-468	Stockwatering (point to point)	Not given		Diligence Claim/Proposed Determination	Yes	BLM-1, SW-5	SR-7	BLM	Lower Robinson Creek
85-211	Stockwatering (point to point)	Not given		Diligence Claim/Proposed Determination	Yes	BLM-1, SW-5	SR-8	C. Diana & Greg Braund & C. Burton Pugh	Lower Robinson Creek
85-459	Stockwatering (point to point)	Not given		Diligence Claim/Proposed Determination	Yes	BLM-1, SW-5	SR-9	BLM	Lower Robinson Creek
85-393	Stockwatering (point to point)	Not given		Diligence Claim/Proposed Determination	Yes	BLM-1, SW-5	SR-10	Sharon C. & Lorene C. Lamb	Lower Robinson Creek
85-213	Stockwatering (point to point)	Not given	None measured	Diligence Claim/Proposed Determination	No	SWOBS-1, SWOBS-2	SR-11	C. Burton Pugh	Right Hand Wash
85-387	Stockwatering (point to point)	Not given	None measured	Diligence Claim/Proposed Determination	No	SWOBS-1, SWOBS-2	SR-12	Darlyn & Arlene Sorensen	Right Hand Wash
85-388	Stockwatering (point to point)	Not given		Diligence Claim/Proposed Determination	Yes	SWOBS-2, SW-9	SR-13	Darlyn & Arlene Sorensen	Sink Valley Wash
Surface Diversions									
85-366	Irrigation, stockwatering	10.0 cfs	None measured	Diligence Claim/Proposed Determination	No	SWOBS-1, SWOBS-2	SD-1	Darlyn & Arlene Sorensen	Right Hand Wash
85-367	Irrigation, stockwatering	10.0 cfs	None measured	Diligence Claim/Proposed Determination	No	SWOBS-2, SW-9	SD-2	Darlyn & Arlene Sorensen	Right Hand Wash
85-368	Irrigation, stockwatering	10.0 cfs	None measured	Diligence Claim/Proposed Determination	No	SWOBS-2, SW-9	SD-3	Darlyn & Arlene Sorensen	Right Hand Wash
85-365	Irrigation, stockwatering	10.0 cfs	SEE SW-8	Diligence Claim/Proposed Determination	No	SW-8, SW-9	SD-4	Darlyn & Arlene Sorensen	Swapp Canyon Creek
85-370	Irrigation, stockwatering	10.0 cfs	None measured	Diligence Claim/Proposed Determination	No	SWOBS-2, SW-9	SD-5	Darlyn & Arlene Sorensen	Sink Valley Wash
85-371	Irrigation, stockwatering	10.0 cfs	None measured	Diligence Claim/Proposed Determination	No	SWOBS-2, SW-9	SD-6	Darlyn & Arlene Sorensen	Sink Valley Wash
85-372	Irrigation, stockwatering	10.0 cfs	None measured	Diligence Claim/Proposed Determination	No	SWOBS-2, SW-9	SD-7	Darlyn & Arlene Sorensen	Sink Valley Wash
85-373	Irrigation, stockwatering	10.0 cfs	None measured	Diligence Claim/Proposed Determination	No	SWOBS-2, SW-9	SD-8	Darlyn & Arlene Sorensen	Sink Valley Wash
85-366	Irrigation, stockwatering	0.25 cfs	3-15	Diligence Claim/Proposed Determination	Yes	SWOBS-2, SP-33, SW-9	SD-9	James, Julie & Lloyd Johnson	Sink Valley Wash
Springs									
85-214	Irrigation, stockwatering	0.033 cfs	4-7	Diligence Claim/Proposed Determination	Yes	SP-14	WRS-1	C. Burton Pugh	Tater Patch Spring
85-350	Irrigation, stockwatering	1.0 cfs	0.38 - 1.5	Diligence Claim/Proposed Determination	Yes	SP-16	WRS-2	Richard L. & Alicia S. Dame	Swapp Ranch Spring Area #1
85-373	Domestic, stockwatering	0.011 cfs	seep - 0.33	Diligence Claim/Proposed Determination	Yes	SP-40	WRS-3	Darlyn & Arlene Sorensen	Sorensen Ranch Spring #1
85-374	Stockwatering	0.011 cfs	seep - 0.33	Diligence Claim/Proposed Determination	Yes	SP-19	WRS-4	Darlyn & Arlene Sorensen	Sorensen Ranch Spring #2
85-351	Irrigation, stockwatering	0.25 cfs	seep - 0.4	Diligence Claim/Proposed Determination	Yes	SP-20	WRS-5	Richard L. & Alicia S. Dame	Swapp Ranch Spring Area #2
85-352	Irrigation, stockwatering	0.25 cfs	seep - 0.4	Diligence Claim/Proposed Determination	Yes	SP-22	WRS-6	Richard L. & Alicia S. Dame	Swapp Ranch Spring Area #3
85-215	Domestic, stockwatering	0.007 cfs	seep - 1.2	Diligence Claim/Proposed Determination	Yes	SP-23	WRS-7	C. Burton Pugh	Spring House Spring
85-363	Irrigation, stockwatering	1.0 cfs	9 to 20	Diligence Claim/Proposed Determination	Yes	SP-8	WRS-8	Richard L. & Alicia S. Dame	Swapp Ranch Spring Area #4
85-375	Stockwatering	0.022 cfs	seep - 1	Diligence Claim/Proposed Determination	Yes	SP-9	WRS-9	Darlyn & Arlene Sorensen	Sorensen Ranch Spring #3
85-355	Irrigation, stockwatering	31.725 ac-ft	3 - 14	Diligence Claim/Proposed Determination	Yes	SP-33	WRS-10A	James, Julie & Lloyd Johnson	Puffer Spring
85-1011	Domestic	0.9 ac-ft	see above	Diligence Claim - Certificate	Yes	SP-33	WRS-10B	James, Julie & Lloyd Johnson	Puffer Spring

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**View looking north at groundwater discharge area B in Sink Valley.
Note that proposed mining locations are north and west of Area B.**



**View looking southwest at groundwater discharge area A in Sink Valley. INCORPORATED
Note that proposed mining locations are west of Area A.**

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View looking east in Lower Robinson Creek drainage in proposed mining area (in foreground).



View looking south down Sink Valley Wash below proposed mining areas.

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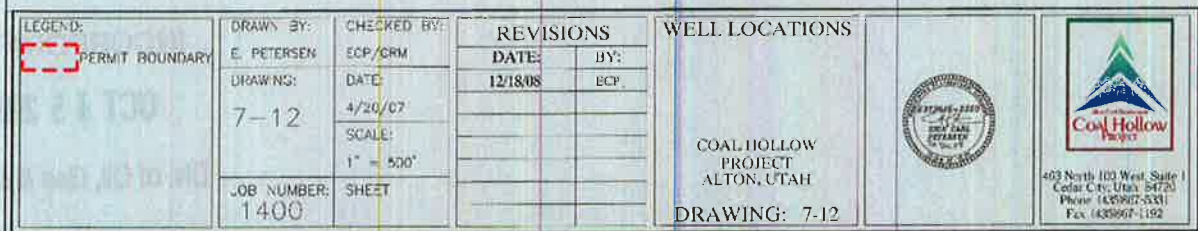


**View looking north at Tropic Shale ridge
and Sink Valley Fault.**

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